

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

FEB 21 2007.

CERTIFIED MAIL 7003 2260 0005 9326 9525
RETURN RECEIPT REQUESTED

Mr. M. H. Burnside
Chevron Oronite Company, LLC
P.O. Box 70
Belle Chase, LA 70037

RE: 2nd Notice of Deficiency / Permit Renewal Application
Storm Water Oil/Water Separator Treatment System
Chevron Oronite Company, LLC
AI # 1708 / PER20050009
GD-075-1511 / P-0112-A-1

Dear Mr. Burnside:

The Waste Permits Division is in receipt of your NOD response dated December 5, 2006, for the permit renewal application of the referenced facility.

Based on the technical review of the NOD response, the following comments are presented regarding items not considered in conformity with the applicable sections of the Louisiana Solid Waste Regulations LAC 33:VII.

Permit Writer Comments

General Please be advised that subchapters §709 and §713 from the first submittal of the permit application should be retained. They are not included in the list to be removed. So, table of content should have §709, §713, and §727 under Chapter 7; and all sections and responses to §709 and §713 inserted in responses to §521 should be removed and relocated to appropriate subchapter in chapter 7.

Please use appropriate tabs to separate all chapters (519, 520, 521, 523, 709, 713, and 727), all appendices, exhibits, tables, references, etc. (See LAC 33:VII.513.B.2.a.)

519.Q. Re-submit the proof of publication from The Advocate. The proof provided in Appendix B of the NOD response is incorrect.

519. The incomplete Part I in Attachment A should be replaced by the signed Part I in Attachment C.

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

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Mr. Burnside/ Chevron
AI # 1708, 2nd NOD, P-0112
Page 2 of 2

521.A.1.e. Update the responses to 521.A.1.e.i, ii, and iii to address:

- The new correspondence from LDWF dated Feb 1, 2006 and
- The new correspondence from USACE dated May 24, 2006.

521.F.1. Provide the certification to meet the standard of 713.B.1.

521.G.1.a. Address the reports requirements to meet LAC 33:VII.713.C.1.a.

521.L.3. Please be advised that there are only three sub-sections under 521.L.3. They are 521.L.3.a, b, and c. There is no sub-section 521.L.3.d.

521.L.4. It is noted that 521.L.4 is label incorrectly as 521.L.3.d.

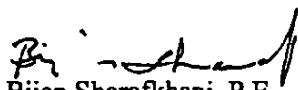
Geological Comments:

521.F.5.c The response to this NOD is acceptable, if the response is reflected in the revised Groundwater Sampling and Analysis Plan, which was not provided for review. Be advised that the Groundwater Sampling and Analysis Plan may require further revision after contaminant characterization analyses for AOC 1 and AOC 2 are completed.

Your response to these items shall be submitted within sixty (60) days of receipt of this letter. Please refer to the sections and denoted regulations when responding to the comments. In addition, four (4) copies of your responses, including appendices, shall be provided. Please reference your Agency Interest # 1708, your Permit # P-0112, and your permit activity # PER20050009 on all correspondence pertaining to this permit application.

If you have any questions concerning this matter, please contact Mr. Hoa Van Nguyen (Permit Writer Review) at 225-219-3047 or Ms. Kathy McGillis (Geological Review) at 225-219-0875.

Sincerely,


Bijan Sharafkhani, P.E.
Administrator
Waste Permits Division

hvn



Oronite

Mike Burnside
Americas Regional
Manager

Oak Point Plant
Chevron Oronite Co. LLC
P. O. Box 70
10285 Highway 23
Belle Chasse, LA 70037
Tel 504-391-6101
Fax 504-391-6356

December 5, 2006

Mr. Bijan Sharafkhani, Administrator
Waste Permits Division
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

LDEQ RECEIPT
6 DEC -7 2006

**Subject: Solid Waste Permit Renewal
Storm Water Treatment System
Response to 1st Notice of Deficiency/Permit Renewal Application
AI No. 17080/PER 20050009/GD-075-1511/Permit No. P-0112-A-1
Chevron Oronite Company, LLC, Belle Chasse, Louisiana**

Dear Mr. Sharafkhani:

The Louisiana Department of Environmental Quality-Waste Permits Division's *1st Notice of Deficiency/Permit Renewal Application* letter dated August 9, 2006, required responses to comments related to the permit renewal application for the Storm Water Oil/Water Separator Treatment System. With this letter, Chevron Oronite Company, LLC (Chevron), provides responses to each comment. Chevron's response to each comment is listed in boldface type below the comment.

NOD Comments and Responses

Technical Comments

General Please relocate the miscellaneous/correspondence section of the permit renewal application, from the first tab (before the table of Content, Volume I) to the last tab of Volume II, in an Appendix.

Comment noted. The miscellaneous information/correspondence section will be relocated in the final permit document.

Address the requirements of 521 incorporating all applicable sections of Chapter 7 in the responses to 521.

December 5, 2006

Page 2

Comment noted. The applicable Chapter 7 language and response will be incorporated in to Chapter 5 in the final permit document. A copy of the revised Chapter 5 is provided in Attachment A.

Remove from the permit renewal application the following unrelated subchapters in chapter 7:

- §701. Standards Governing Industrial Solid Waste Generators
- §703. Standards Governing Solid Waste Accumulation and Storage.
- §705. Standards Governing Collectors and Off-Site Transporters of SW.
- §707. Standards Governing Pickup Stations for Solid Waste.
- §711. Standards Governing Landfills.
- §715. Standards Governing Landfarms.
- §717. Standards Governing All Solid Waste Processors.
- §719. Standards Governing All Minor Processing and Disposal Facilities.
- §721. C&D Debris and Woodwaste Landfills and Processing Facilities.
- §723. Composting Facilities.
- §725. Separation and Woodwaste Processing Facilities.

Comment noted. These items will be removed from the final permit document.

519.M.

Your response to this requirement should be: N/A
Also, please remove the old LRRDA letter from Appendix B.

Comment noted. The revision will be incorporated into the final permit document and the old LRRDA letter will be removed from the final permit document. This revision is found on page 5-3 of the revised permit in Attachment A.

519.Q.

Provide the proof of publication of the public notice in Appendix D.

The proof of public notice is included as Attachment B. The proof of public notice will be incorporated into the final permit document as Appendix B.

519.R.

Provide signature and date as required.

Provide proof of the legal authority of the signee to sign for the applicant.

The signature, date, and proof of the legal authority of the signee to sign for Chevron Oronite Company, LLC (Chevron), is included as Attachment C. Additionally, assigned copy of 519.R. is also provided in Attachment C. This document will be incorporated into the final permit document as Appendix C.

520.

Please copy this requirement and respond.

Relocate the "Certificate from the Secretary of State" from Appendix AA to the page right after page, "Addendum to Permit Applications per LAC 33:VII.I.1701." This certificate is part of the addendum. These two documents are to respond to

December 5, 2006
Page 3

Section LAC 33:VII.520. They should be located after LAC 33:VII.519 (Part I) and before LAC 33:VII.521 (Part II)

Comment noted. The revisions will be incorporated into the final permit document as shown in the Table of Contents contained in Attachment A.

521.A.1.c. Identify sources that generate data in table 1

The data in Table 1 was generated from the United States Geological Survey (USGS) Gap Analysis Program (GAP) Data and USGS Digital Raster Graphics Bertrandville, Louisiana quadrangle. The data was obtained in January 2006 from the <www.nwrc.usgs.gov> Internet web page. This revision is found on page 5-8 of the revised permit in Attachment A.

521.A.1.e.ii. Provide updated letters from the following state and federal agencies:

1. State Historic Preservation Office.
2. Louisiana Department of Wildlife and Fisheries.
3. U.S. Department of the Army, Corps of Engineers.

Updated letters from State Historic Preservation Office, Louisiana Department of Wildlife and Fisheries, and U.S. Department of the Army, Corps of Engineers are included in Attachment D. These letters will replace the previous letters in the final permit document. The revised letters will be incorporated into the final permit document as Appendices D, E, and F.

521.B.1.a. Fig. 11, the plan view drawing is illegible. Please provide a legible plan view drawing that includes the new pump station.

Identify the Storm-water Oil-water Separator in the detailed map, Fig. 12.

Provide or identify the Storm Water Impoundment Basin in the schematic of the wastewater treatment process, Fig. 13.

Attachment E contains revised Figures 11, 12, and 13. These figures will be incorporated into the final permit document.

521.B.1.c. Incorporate in this section the standard of LAC 33:VII.709.B.2 and address that if the facility meets the buffer zone requirement of 709.B.2.a (buffer zone of not less than 200 feet) and the requirement of 709.B.2.b (no storage, processing, or disposal within the buffer zone)

The facility meets the buffer zone requirement of 709.B.2.a. The following revisions will be incorporated into the final permit document on page 5-16:

December 5, 2006
Page 4

LAC 33:VII.709.B.2. Buffer Zones

- a. **Buffer zones of not less than 200 feet shall be provided between the facility and the property line. A reduction in this requirement shall be allowed only with the permission, in the form of a notarized affidavit, of the adjoining landowner and occupants. A copy of the notarized affidavit waiving the 200-foot buffer zone shall be entered in the mortgage and conveyance records of the parish for the adjoining landowner's property. Buffer zone requirements may be waived or modified by the administrative authority for areas of landfills which have been closed in accordance with these regulations and for existing facilities, or in accordance with LAC 33:VII.307.**

Chevron meets the 200-foot buffer zone requirement.

LAC 33:VII.709.B.2. Buffer Zones

- b. **No storage, processing, or disposal of solid waste shall occur within the buffer zone.**

Chevron does not conduct storage, processing, or disposal of solid waste within the buffer zone.

- 521.F.1. Incorporate (or copy) in this section the related standard of LAC 33:VII.713.B.1, respond to the standard, and provide required documentation to meet the standard.

The following revisions will be incorporated into the final permit document:

LAC 33:VII.713.B. Facility Plans and Specifications

1. **Plans, specifications, and operations represented and described in the permit application or permit modifications for all facilities must be prepared under the supervision of and certified by a registered engineer, licensed in the state of Louisiana.**

The plans, specifications, and operations represented and described in the permit application for the existing Storm Water Impoundment Basin, with the exception of the new pump station, were designed by Waldemar S. Nelson Company of New Orleans, Louisiana, and built in 1973. Waldemar S. Nelson Company, a registered local Architects and Engineers consulting firm, has been in existence since 1945. The Storm Water Impoundment Basin was initially permitted on July 28, 1986. The facility has been permitted since 1986.

The new pump station was designed by Mr. Justin Bottger, a professional engineer licensed in the state of Louisiana.

December 5, 2006
Page 5

The certification of this permit application by the preparers of the permit is provided in Attachment F and will be incorporated in Appendix P of the revised permit.

521.G.1.a. Address and incorporate into this section the standard of LAC 33:VII.713.C.1.a (in addition to 713.C.1.b)

Remove the sentence (top of page 5-27), "The current Turnover Reports are kept electronically for at least one year." Please be advised that records shall be maintained for the life of the facility and shall be kept on file for at least three years after closure.

Comment noted. This statement was removed from the revised permit document in Attachment A.

521.H.1.a. Provide in this section the following items:

- types of waste that the facility receives. For example: surface free oil, bottoms sludge, storm water runoff, etc.
- description of each type of waste (chemical, physical, biological characteristics of the waste)
- sources of each type of waste.

The following additions were incorporated on pages 5-42 and 5-44 of the revised permit in Attachment A.

The Storm Water Treatment System receives storm water runoff generated during rain events. The influent to the facility primarily contains surface free oil, bottoms sludge, and storm water runoff. Other solids which collect in the Storm Water Treatment System consist of soil (dirt) which washes into the system from plant roadways and surrounding undeveloped, nonconcreted, or nonpaved areas.

A sample of the liquid influent to the Storm Water Treatment System was analyzed by the toxicity characteristic leaching procedure (TCLP). The TCLP indicated that the influent does not exhibit hazardous waste characteristics. The analytical results of the TCLP analysis were provided in the permit application and will be reproduced in the final permit document.

The main source of the input to the system is rainfall. Additionally, leaks and spills from the transfer or bulk storage systems, solids associated with storage tanks or silos, and surface dirt transferred to the system through sheet flow are sources of waste collected and transferred to the Storm Water Treatment System.

521.H.1.b. There appears to be a conflict in the description of the depth the Basin:
Page 5-28, H.1.a, "The Basin occupies approximately 180,000 square feet of area and has a maximum level of 12 feet."

December 5, 2006
Page 6

Page 5-29, H.1.b, "The Storm Water Impoundment Basin is a large aerated pond occupying approximately 180,000 square feet and is 14 feet deep."

Please correct or explain.

The maximum operational level of the Basin is 12 feet; however, the total depth of the Basin is 14 feet. The 12-foot operational level allows for 2 feet of freeboard. An explanation of the maximum operation level versus the total depth of the basin will be incorporated in the above referenced locations in the final permit document. These revisions are found on pages 5-43 and 5-44 of the revised permit in Attachment A.

- 521.H.2.a. Provide in this section a summary of the detailed 22-page Operation and Maintenance Plans for the Storm Water Treatment System in Appendix W.

The Operation and Maintenance Plan for the Storm Water Treatment System describes the requirements for proper operation and maintenance of the storm water system. This manual describes daily system checks, sampling requirements (streams, parameters, frequencies, etc.), preparation of wastes for disposal, and emergency procedures for the Ecology area, which includes the Storm Water Treatment System. This revision is found on page 5-46 of the revised permit in Attachment A.

- 521.H.7. Provide in this section a summary of the related information in Appendix W that you refer to the response to the required comprehensive air monitoring plan.

The Storm Water Treatment System is an operational Type I facility. It does not have the potential to produce gases, therefore the Operation and Maintenance Plan for the Storm Water Treatment System does not contain a comprehensive air monitoring plan. This information will be provided in the final permit document. This revision is found on page 5-49 of the revised permit in Attachment A.

- 521.L.3. Address and incorporate into the responses of this section all applicable standards governing Financial Responsibility During Operation contained in LAC 33:VII.727.A.1.

Comment noted. In the final permit document, all applicable standards governing Financial Responsibility will be addressed. This revision is found in a separate tab labeled "727" of the revised permit as shown in the Table of Contents contained in Attachment A.

- 521.L.4. Address and incorporate into the responses of this section all applicable standards governing Financial Responsibility for Closure and Post-Closure Care contained in LAC 33:VII.727.A.2.

Provide updated financial assurance documents in Appendix Z.

Notes:

December 5, 2006

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1. The Financial Test and Corporate Guarantee have been submitted to meet the requirements in sections 521.L.3 & 4.
2. If a requirement in 727.A.1 & 2 does not apply, please state in the response that it does not apply and explain why.
3. Following is an example of a response:

727.A.1.d.i Evidence of liability insurance may consist of either a signed duplicate original of a solid waste liability endorsement, or a certificate of insurance.

Response: This requirement does not apply. The facility is providing financial assurance by means of financial test and corporate guarantee.

Comment noted. In the final permit document, explanations will be provided for financial requirements that do not apply. An updated financial assurance document is included in Attachment G. The contents of this attachment will be incorporated into the final permit document as Attachment X.

Engineering Comments

521.J.1.c. Please provide estimated broken down unit costs associated with closure.

Attachment H contains estimated broken down unit costs associated with closure. The contents of this attachment will be incorporated into the final permit document as Appendix V.

521.J.2.c. Please provide an estimate of the maximum inventory of solid waste ever on site as required by this section.

The maximum inventory of solid waste ever on site is estimated to be 4,025 tons of dewatered material from the basin. This is the amount of sludge removed during a previous desludging event. This revision is found on page 5-58 of the revised permit in Attachment A.

Geological Comments

521.D.1.b. Boring logs must be provided for all soil borings and monitor wells installed on the facility.

Boring logs associated with the Storm Water Treatment System are provided in Attachment I. These logs will be provided in the final permit as Appendix M.

521.D.1.c. All available geotechnical test data must be included in the permit application.

All available geotechnical test data associated with the Storm Water Treatment System was provided in the original permit application. This data will be provided

December 5, 2006

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in Appendix M as shown in the Table of Contents of the revised permit in Attachment A.

- 521.D.1.d. Provide a geologic cross-section from available published information depicting stratigraphy to a depth of at least 200 feet below ground surface.

Attachment J contains Figure 18, which depicts the regional stratigraphy to a depth of approximately 3,600 feet below ground surface. This figure will be incorporated into the final permit document.

- 521.E.1. Include boring logs from the two deep test wells. Provide isopach maps of the Upper Clay and the 30-Foot Zone. Provide a map of structure on the 30-Foot Zone.

Chevron has reviewed all available files and can not locate the boring logs for the two deep test wells. Attachment J contains an isopach of the Upper Clay Zone (Figure 19), an isopach of the 30-Foot Zone (Figure 20), and a structure map of the 30-Foot Zone (Figure 21).

- 521.E.1.a.iii. Provide potentiometric maps for the Upper Clay zone.

Attachment J contains Figure 26, a potentiometric map of the Upper Clay zone. This figure will be incorporated into the final permit document.

- 521.E.1.b.iii. Address interconnection between the Upper Clay and the 30-Foot Zone.

The water bearing sediments of the Upper Clay Zone are discontinuous across the facility. Inspection of the borings logs and cross sections around the Storm Water Treatment System reveals that water bearing sediments of the Upper Clay are not present. The 30-Foot zone has historically been recognized as the uppermost water bearing zone beneath the Storm Water Treatment System. This revision is found on page 5-30 of the revised permit in Attachment A.

- 521.F.5.a. Cross-section C-C' (Figure 16) indicates that MW-17 is screened in the Upper Clay rather than the 30-Foot Zone. Provide boring logs and justification for the screened intervals in MW-13, MW-14R, MW-15, MW-16R, MW-17R, MW-18R, and MW-50.

Boring logs and well construction logs, where available, are provided in Attachment I for all wells associated with the Storm Water Treatment System. The logs demonstrate that all wells are screened in the 30-Foot Zone, which is identified as the uppermost water bearing zone beneath the Storm Water Treatment System. Updated cross sections have been provided in Attachment E. These figures will replace figures 15, 16, and 17 of the original permit application.

- 521.F.5.b. Provide as-built diagrams for MW-13, MW-14R, MW-15, MW-16R, MW-17R, MW-18R, and MW-50. Specify the screen slot size for each well. Cross-sections shall incorporate all seven wells, with screened intervals shown. The points of compliance must be depicted on a scaled map. MW-14R is located within the tentatively delineated boundary of AOC 1; upon further review this well may have to be relocated.

December 5, 2006

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Monitor well construction logs, where available, are provided in Attachment I. Updated cross sections are provided in Attachment E. The point of compliance is provided on Figure 31 in Attachment I. Monitor Well MW-14R will continue to function as an upgradient well until the boundary of AOC-1 is fully delineated. This revision is found on page 5-36 of the revised permit in Attachment A.

- 521.F.5.c. In addition to the parameters specified in the Groundwater Sampling Plan (Appendix R), TPH-GRO, TPH-DRO, and TPH-ORO, or the equivalent hydrocarbon fractions, shall be added and analyzed using Method 8015.

The Groundwater Sampling and Analysis Plan will be amended to include the TPH-GRO, TPH-DRO, and TPH-ORO fractions analyzed using the Massachusetts extractable petroleum hydrocarbon/volatile petroleum hydrocarbon (EPH/VPH) method. The Sampling and Analysis Plan in the final permit will incorporate this change. The Groundwater Sampling and Analysis Plan will be provided in Appendix Q as shown in the Table of Contents of the revised permit in Attachment A.

- 709.C.1. Provide all soil boring logs for review.

Copies of all available soil boring logs associated with the Storm Water Treatment System are provided in Attachment I. These logs will be provided in the final permit document in Appendix M.

- 709.E.1. Provide boring logs and identify screened intervals for all monitoring wells for the Storm Water Treatment System. Be advised that the Groundwater Monitoring System may require modification after LDEQ review of the response to these deficiencies.

Copies of all available soil boring logs and monitor well construction logs associated with the Storm Water Treatment System are provided in Attachment I. These logs will be provided in the final permit document in Appendix M.

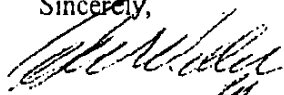
- 709.E.2. In addition to the parameters specified in the Groundwater Sampling Plan (Appendix R), TPH-GRO, TPH-DRO, and TPH-ORO, or the equivalent hydrocarbon fractions, shall be added and analyzed using Method 8015. Be advised that the Groundwater Sampling Plan may require further revision after LDEQ review of the response to these deficiencies.

The Groundwater Sampling and Analysis Plan will be amended to include the TPH-GRO, TPH-DRO, and TPH-ORO fractions analyzed using the Massachusetts extractable petroleum hydrocarbon/volatile petroleum hydrocarbon (EPX/VPH) method. The Sampling and Analysis Plan in the final permit will incorporate this change. The Groundwater Sampling and Analysis Plan will be provided in Appendix Q as shown in the Table of Contents of the revised permit in Attachment A.

December 5, 2006
Page 10

If you have any questions concerning this information please contact Troy Sampey of my staff at (504) 391-6314.

Sincerely,

A handwritten signature in black ink, appearing to read "M. H. Burnside", written over the printed name.

M. H. Burnside

cc: Mr. Hoa Van Nguyen
Mr. John Ellis, ARCADIS, Baton Rouge, Louisiana

December 5, 2006

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Attachment A	Revised Chapter 5
Attachment B	Proof of Public Notice
Attachment C	Proof of Legal Authority
Attachment D	Updated Correspondence
Attachment E	Revised Figures
Attachment F	Permit Application Preparer Certification
Attachment G	Updated Financial Assurance Documents
Attachment H	Estimated Closure Costs
Attachment I	Soil Boring Logs and Well Construction Diagrams
Attachment J	New Figures



DEPARTMENT OF ENVIRONMENTAL QUALITY

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

OCT 10 2006

Mr. M. H. Burnside
Chevron Oronite Company, LLC
P.O. Box 70
Belle Chase, LA 70037

RE: Approval of Extension Request for Response to NOD
Storm Water Oil/Water Separator Treatment System
Chevron Oronite Company, LLC
AI No. 1708 / PER20050009
GD-075-1511 / P-0112-A-1

Dear Mr. Burnside:

The Waste Permits Division is in receipt of your letter dated October 5, 2006, requesting an extension to submit the responses to the August 09, 2006 notice of deficiency (NOD) for the solid waste permit renewal application for the referenced facility.

According to your submittal, more time is needed to properly respond to financial assurance requirements and geological comments. Therefore, your extension request is hereby approved. The submittal of the NOD responses will be extended to November 15, 2006, as requested.

Please reference your AI #1708, PER # 20050009, and permit number P-0112-A-1 on all future correspondence pertaining to this permit renewal application. If you have any questions regarding this matter, please contact Mr. Hoa Van Nguyen at (225) 219-3047.

Sincerely,

Bijan Sharafkhani, P.E.
Administrator
Waste Permit Division

hvn

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

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Oronite

Mike Burnside
Americas Regional
Manager

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Tel 504-391-6101
Fax 504-391-6356

October 5, 2006

Mr. Bijan Sharafkhani, Administrator
Waste Permits Division
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

RECEIVED
OCT 10 2006
ARCADES Gangley & Miller

**Subject: Solid Waste Permit Renewal
Storm Water Treatment System
1st Notice of Deficiency / Permit Renewal Application Extension
AI No. 1708 / PER 20050009/GD-075-1511 / Permit No. P-0112-A-1
Chevron Oronite Company, LLC Belle Chasse, Louisiana**

Dear Mr. Sharafkhani:

On September 12, 2006, Chevron Oronite Company, LLC (Chevron) representatives met with LDEQ Officials to discuss the letter received from your office "1st Notice of Deficiency / Permit Renewal Application". The meeting was helpful in establishing the criteria to respond to the NOD's. At the same time we received approval to submit the responses by October 12, 2006. We are approximately seventy percent complete with the responses. Addressing the requirements of 521 incorporating all applicable sections of Chapter 7 in the responses to 521, obtaining a written statement from the attorney general(s) or insurance commissioner(s) of the state in which the guarantor is incorporated to satisfy the requirements of a corporate guarantee, and addressing some of the geological comments have taken longer than anticipated.

At this time, Chevron would like to request additional time to submit the required information. This extension would make the due date of the responses November 15, 2006.

Should you have any questions or need further clarification please contact Troy Sampey of my staff at (504) 391-6314.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. H. Burnside".

M. H. Burnside

c.c. Mr. Hoa Van Nguyen



Oronite

Mike Burnside
Americas Regional
Manager

Oak Point Plant
Chevron Oronite Co. LLC
P. O. Box 70
10285 Highway 23
Belle Chasse, LA 70037
Tel 504-391-6101
Fax 504-391-6356

August 22, 2006

Mr. Bijan Sharafkhani, Administrator
Waste Permits Division
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

RECEIVED

AUG 24 2006

ARCADIS Geraghty & Miller

**Subject: Solid Waste Permit Renewal
Storm Water Treatment System
1st Notice of Deficiency / Permit Renewal Application Extension
AI No. 1708 / PER 20050009
GD-075-1511 / Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana**

Dear Mr. Sharafkhani:

On August 15, 2006, Chevron Oronite Company, LLC (Chevron) received a letter from your office "1st Notice of Deficiency / Permit Renewal Application". The letter indicated that the response to these items shall be submitted within thirty (30) days of receipt of the letter. We have begun the process of compiling the responses required in the letter. To fully understand the request of the letter and submit the information as required, we would like to schedule a meeting with the permit writer in a few weeks.

At this time, Chevron would like to request a sixty (60) day extension to submit the required information. This extension would make the due date of the responses November 13, 2006.

Should you have any questions or need further clarification please contact Troy Sampey of my staff at (504) 391-6314.

Sincerely,

A handwritten signature in black ink, appearing to read "M H Burnside".

M. H. Burnside

c.c. Mr. Hoa Van Nguyen

08/15/2006 13:54

3916496

COMPLAINT

PAGE 02

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

KATHLEEN BABINEAUX BLANCO

GOVERNOR

MIKE D. McDANIEL, Ph.D.

SECRETARY

AUG 09 2006

CERTIFIED MAIL 7004 1160 0001 9950 5761

Mr. M. H. Burnside
Chevron Oronite Company, LLC
P.O. Box 70
Belle Chase, LA 70037

RE: 1st Notice of Deficiency / Permit Renewal Application
Storm Water Oil/Water Separator Treatment System
Chevron Oronite Company, LLC
AI # 1708 / PER20050009
GD-075-1511 / P-0112-A-1

Dear Mr. Burnside:

The Waste Permits Division is in receipt of your permit renewal application dated January 18, 2006, for the referenced facility.

Based on the technical review of the permit application, the following comments are presented regarding items not considered in conformity with the applicable sections of the Louisiana Solid Waste Regulations LAC 33:VII.

Technical Comments

General Please relocate the miscellaneous / correspondence section of the permit renewal application, from the first tab (before the table of Content, Volume I) to the last tab of Volume II, in an Appendix.

Address the requirements of 521 incorporating all applicable sections of Chapter 7 in the responses to 521.

Remove from the permit renewal application the following unrelated subchapters in chapter 7:

- §701. Standards Governing Industrial Solid Waste Generators
- §703. Standards Governing Solid Waste Accumulation and Storage.
- §705. Standards Governing Collectors and Off-Site Transporters of SW.
- §707. Standards Governing Pickup Stations for Solid Waste.
- §711. Standards Governing Landfills.
- §715. Standards Governing Landfills.
- §717. Standards Governing All Solid Waste Processors.

ENVIRONMENTAL SERVICES

: PO BOX 4313, BATON ROUGE, LA 70821-4313

P:225-219-3181 F:225-219-3309

WWW.DEQ.LOUISIANA.GOV

Mr. Buraside
Chevron, AI # 1708
Page 2 of 6

- §719. Standards Governing All Minor Processing and Disposal Facilities.
- §721. C&D Debris and Woodwaste Landfills and Processing Facilities.
- §723. Composting Facilities.
- §725. Separation and Woodwaste Processing Facilities.

519.M. Your response to this requirement should be: N/A
Also, please remove the old LRRDA letter from Appendix B.

519.Q. Provide the proof of publication of the public notice in Appendix D.

519.R. Provide signature and date as required.

Provide proof of the legal authority of the signee to sign for the applicant.

520. Please copy this requirement and respond.

Relocate the "Certificate from the Secretary of State" from Appendix AA to the page right after page, "Addendum to Permit Applications per LAC 33:VII.1701." This certificate is part of the addendum. These two documents are to respond to section LAC 33:VII.520. They should be located after LAC 33:VII.519 (Part I) and before LAC 33:VII.521 (Part II)

521.A.1.c. Identify sources that generate data in table 1

521.A.1.e.ii. Provide updated letters from the following state and federal agencies:

1. State Historic Preservation Office.
2. Louisiana Department of Wildlife and Fisheries.
3. U.S. Department of the Army, Corps of Engineers.

521.B.1.a. Fig. 11, the plan view drawing is illegible. Please provide a legible plan view drawing that includes the new pump station.

Identify the Storm-water Oil-water Separator in the detailed map, Fig. 12.

Provide or identify the Storm Water Impoundment Basin in the schematic of the wastewater treatment process, Fig. 13.

521.B.1.c. Incorporate in this section the standard of LAC 33:VII.709.B.2 and address that if the facility meets the buffer zone requirement of 709.B.2.a

Mr. Burnside
Chevron, AI # 1708
Page 3 of 6

(buffer zone of not less than 200 feet) and the requirement of 709.B.2.b (no storage, processing, or disposal within the buffer zone)

521.F.1. Incorporate (or copy) in this section the related standard of LAC 33:VII.713.B.1, respond to the standard, and provide required documentation to meet the standard.

521.G.1.a. Address and incorporate into this section the standard of LAC 33:VII.713.C.1.a (in addition to 713.C.1.b)

Remove the sentence (top of page 5-27), "*The current Turnover Reports are kept electronically for at least one year.*" Please be advised that records shall be maintained for the life of the facility and shall be kept on file for at least three years after closure.

521.H.1.a. Provide in this section the following items:

- types of waste that the facility receives. For example: surface free oil, bottoms sludge, storm water runoff, etc.
- description of each type of waste (chemical, physical, biological characteristics of the waste)
- sources of each type of waste.

521.H.1.b. There appears to be a conflict in the description of the depth the Basin: Page 5-28, H.1.a, "The Basin occupies approximately 180,000 square feet of area and has a maximum level of 12 feet." Page 5-29, H.1.b, "The Storm Water Impoundment Basin is a large aerated pond occupying approximately 180,000 square feet and is 14 feet deep." Please correct or explain.

521.H.2.a. Provide in this section a summary of the detailed 22-page Operation and Maintenance Plans for the Storm Water Treatment System in Appendix W.

521.H.7. Provide in this section a summary of the related information in Appendix W that you refer to the response to the required comprehensive air monitoring plan.

Mr. Burnside
Chevron, AI # 1708
Page 4 of 6

- 521.L.3. Address and incorporate into the responses of this section all applicable standards governing Financial Responsibility During Operation contained in LAC 33:VII.727.A.1.
- 521.L.4. Address and incorporate into the responses of this section all applicable standards governing Financial Responsibility for Closure and Post-Closure Care contained in LAC 33:VII.727.A.2.

Provide updated financial assurance documents in Appendix Z.

Notes:

1. The Financial Test and Corporate Guarantee have been submitted to meet the requirements in sections 521.L.3 & 4.
2. If a requirement in 727.A.1 & 2 does not apply, please state in the response that it does not apply and explain why.
3. Following is an example of a response:

727.A.1.d.i Evidence of liability insurance may consist of either a signed duplicate original of a solid waste liability endorsement, or a certificate of insurance.

Response: This requirement does not apply. The facility is providing financial assurance by means of financial test and corporate guarantee.

Engineering Comments

- 521.J.1.c. Please provide estimated broken down unit costs associated with closure.
- 521.J.2.c. Please provide an estimate of the maximum inventory of solid waste ever on site as required by this section.

Geological Comments:

- 521.D.1.b. Boring logs must be provided for all soil borings and monitor wells installed on the facility.
- 521.D.1.c. All available geotechnical test data must be included in the permit application.

Mr. Burnside
Chevron, AI # 1708
Page 5 of 6

- 521.D.1.d. Provide a geologic cross-section from available published information depicting stratigraphy to a depth of at least 200 feet below ground surface.
- 521.E.1. Include boring logs from the two deep test wells. Provide isopach maps of the Upper Clay and the 30-Foot Zone. Provide a map of structure on the 30-Foot Zone.
- 521.E.1.a.iii. Provide potentiometric maps for the Upper Clay zone.
- 521.E.1.b.iii. Address interconnection between the Upper Clay and the 30-Foot Zone.
- 521.F.5.a. Cross-section C-C' (Figure 16) indicates that MW-17 is screened in the Upper Clay rather than the 30-Foot Zone. Provide boring logs and justification for the screened intervals in MW-13, MW-14R, MW-15, MW-16R, MW-17R, MW-18R, and MW-50.
- 521.F.5.b. Provide as-built diagrams for MW-13, MW-14R, MW-15, MW-16R, MW-17R, MW-18R, and MW-50. Specify the screen slot size for each well. Cross-sections shall incorporate all seven wells, with screened intervals shown. The points of compliance must be depicted on a scaled map. MW-14R is located within the tentatively delineated boundary of AOC 1; upon further review this well may have to be relocated.
- 521.F.5.c. In addition to the parameters specified in the Groundwater Sampling Plan (Appendix R), TPH-GRO, TPH-DRO, and TPH-ORO, or the equivalent hydrocarbon fractions, shall be added and analyzed using Method 8015.
- 709.C.1. Provide all soil boring logs for review.
- 709.E.1. Provide boring logs and identify screened intervals for all monitoring wells for the Storm Water Treatment System. Be advised that the Groundwater Monitoring System may require modification after LDEQ review of the response to these deficiencies.
- 709.E.2. In addition to the parameters specified in the Groundwater Sampling Plan (Appendix R), TPH-GRO, TPH-DRO, and TPH-ORO, or the equivalent hydrocarbon fractions, shall be added and analyzed using Method 8015. Be advised that the Groundwater Sampling Plan may require further revision after LDEQ review of the response to these deficiencies.

Your response to these items shall be submitted within thirty (30) days of receipt of this letter. Please refer to the sections and denoted regulations when responding to the comments. In addition, four (4) copies of your responses, including appendices, shall be

08/15/2006 13:54 3916496

COMPLAINT

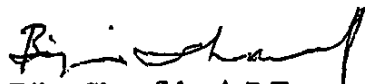
PAGE 07

Mr. Burnside
Chevron, AI # 1708
Page 6 of 6

provided. Please reference your Agency Interest # 1708, your Permit # P-0112, and your permit activity # PER20050009 on all correspondence pertaining to this permit application.

If you have any questions concerning this matter, please contact Mr. Hoa Van Nguyen (Technical Review) at 225-219-3047, Mr. Jonathan McFarland (Engineering Review) at 225-219-3461, or Ms. Kathy McGillis (Geological Review) at 225-219-0875.

Sincerely,



Bijan Sharafkhani, P.E.
Administrator
Waste Permits Division

hvn

Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037
Tel 504/391-6100
Fax 504/391-6356

M.H. Burnside
Americas regional Manager

October 4, 2005



Mr. Lenny Young, Administrator
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Subject: Additional Information for Pump Station Expansion
Minor Modification / Impoundment Basin
AI No. 1708 / PER 20040008
Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

10054 554543

Dear Mr. Young:

Enclosed for your review are three copies of Chevron Oronite Company Oak Point Plant Stormwater Impoundment Basin Installation Of New Pumping Station Sediment Quality Report prepared by Tetra Tech EC, Inc. This information is being submitted based on the request of Louisiana Department of Environmental Quality's (LDEQ) letters dated March 18, 2005 (Minor Modification for Pump Station Expansion) and June 29, 2005 (Additional Information for Pump Station Expansion). Also enclosed are three copies of Geotechnical Investigation Chevron Chemical Company Oak Point Plant Stormwater Pumping Station Belle Chasse, Louisiana prepared by Eustis Engineering Company, Inc. This information is being submitted based on the request of LDEQ's letter dated June 29, 2005 (Additional Information for Pump Station Expansion).

Should you have any questions or need further clarification please contact Troy Sampey of my staff at (504) 391-6314.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. H. Burnside".

M. H. Burnside

c.c. Mr. Hoa Van Nguyen
Enclosure

Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037
Tel 504/391-6100
Fax 504/391-6356

M.H. Burnside
Americas regional Manager

October 4, 2005



Mr. Lenny Young, Administrator
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

**Subject: Additional Information for Pump Station Expansion
Minor Modification / Impoundment Basin
AI No. 1708 / PER 20040008
Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana**

Dear Mr. Young:

Enclosed for your review are three copies of Chevron Oronite Company Oak Point Plant Stormwater Impoundment Basin Installation Of New Pumping Station Sediment Quality Report prepared by Tetra Tech EC, Inc. This information is being submitted based on the request of Louisiana Department of Environmental Quality's (LDEQ) letters dated March 18, 2005 (Minor Modification for Pump Station Expansion) and June 29, 2005 (Additional Information for Pump Station Expansion). Also enclosed are three copies of Geotechnical Investigation Chevron Chemical Company Oak Point Plant Stormwater Pumping Station Belle Chasse, Louisiana prepared by Eustis Engineering Company, Inc. This information is being submitted based on the request of LDEQ's letter dated June 29, 2005 (Additional Information for Pump Station Expansion).

Should you have any questions or need further clarification please contact Troy Sampey of my staff at (504) 391-6314.

Sincerely,

[Handwritten signature]
DB 10/5/05

M. H. Burnside

c.c. Mr. Hoa Van Nguyen
Enclosure

Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037
Tel 504/391-6100
Fax 504/391-6356

M.H. Burnside
Americas regional Manager

October 3, 2005



Mr. Lenny Young, Administrator
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Subject: Solid Waste Permit Renewal Application Extension
Storm Water Treatment System
AI No. 1708 / PER 20050009
GD-075-1511 / Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

Dear Mr. Young:

On July 19, 2005, Chevron Oronite Company, LLC (Chevron) submitted a request that the mandatory permit modification application for our Storm Water Treatment System submitted as required on January 31, 1994, be considered as our Solid Waste Permit renewal and that a revised Solid Waste Permit Application will be submitted by November 23, 2005. We have recently received a letter from your office indicating that the request was received and the review of the permit renewal application will begin once your department receives the revised application.

We are currently in the process of compiling the information required for the permit renewal application. Due to the disruptions caused by Hurricanes Katrina and Rita, Chevron hereby submits a request for a sixty (60) day extension to submit the permit renewal application.

Should you have any questions or need further clarification please contact Troy Sampey of my staff at (504) 391-6314.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. H. Burnside", with a stylized flourish at the end.

M. H. Burnside

c.c. Mr. Hoa Van Nguyen



State of Louisiana
Department of Environmental Quality



KATHLEEN BABINEAUX BLANCO
GOVERNOR

SEP 01 2005

MIKE D. McDANIEL, Ph.D.
SECRETARY

CERTIFIED MAIL 7004 1160 0001 9950 5457
RETURN RECEIPT REQUIRED

Mr. M. H. Burnside
Chevron Oronite Company, LLC
P.O. Box 70
Belle Chase, LA 70037

RE: Solid Waste Permit Renewal Application
Storm Water Oil/Water Separator Treatment System
Chevron Oronite Company, LLC
AI No. 1708 / PER20050009
GD-075-1511 / P-0112-A-1

Dear Mr. Burnside:

The Water and Waste Permits Division is in receipt of your permit renewal application fee and your submittal dated July 19, 2005, requesting that the 1994 mandatory modification (MMD) be considered as your solid waste permit renewal application for the referenced facility.

According to your request, a revised permit application will be submitted by November 23, 2005, to include all approved modifications made after the submittal of the MMD. Please be advised that the revised application should be submitted as a standalone document to facilitate the review process.

Your request is acknowledged and the review of your permit renewal application will begin once we receive your revised permit application.

Please reference your AI #1708, PER # 20050009, and permit number P-0112-A-1 on all future correspondence pertaining to this permit renewal application. If you have any questions regarding this matter, please contact Mr. Hoa Van Nguyen at (225) 219-3047.

Sincerely,

Beth Scardina
Environmental Scientist Manager
Solid and Hazardous Waste Permits Section

hvn



Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037
Tel 504/391-6100
Fax 504/391-6356

M.H. Burnside
Americas regional Manager

July 19, 2005



Mr. Lenny Young, Administrator
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

**Subject: Solid Waste Permit Renewal Application
Storm Water Treatment System
AI No. 1708 / Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana**

Dear Mr. Young:

Chevron Oronite Company LLC, is requesting that the mandatory permit modification application for our Storm Water Treatment System submitted as required on January 31, 1994, be considered as our Solid Waste Permit renewal. This permit applies to our Single LPDES Wastewater Impoundment (Storm Water Impoundment Basin), Storm Water Oil/Water Separator, and Interconnecting Ditches at the Oak Point Plant (Facility Number GD-075-1511). The application was determined to be administratively complete by the Department and public notice was made.

A revised Solid Waste Permit Application will be submitted by November 23, 2005, to include the approved modification to the Storm Water Treatment system that were made after the submittal of the mandatory permit modification and another approved modification that is currently in process.

Also included is our check in the amount \$3,300.00 for the review of the revised Solid Waste Permit application to be submitted by November 23, 2005.

Should you have any questions or need further clarification please contact Troy Sampey of my staff at (504) 391-6314.

Sincerely,

A handwritten signature in dark ink, appearing to read "M. H. Burnside", with a small flourish at the end.

M. H. Burnside

c.c. Mr. Hoa Van Nguyen



State of Louisiana
Department of Environmental Quality



KATHLEEN BABINEAUX BLANCO
GOVERNOR

JUN 29 2005

MIKE D. McDANIEL, Ph.D.
SECRETARY

CERTIFIED MAIL 7004 1160 0001 9950 5426
RETURN RECEIPT REQUIRED

Mr. M. H. Burnside
Chevron Oronite Company, LLC
P.O. Box 70
Belle Chase, LA 70037

RE: Additional Information for Pump Station Expansion
Minor Modification / Impoundment Basin
Chevron Oronite Company, LLC
AI# 1708 / PER 20040008

Dear Mr. Burnside:


We are in receipt of your submittal dated May 31, 2005, requesting the installation of an interlocking steel sheet cutoff wall as additional part of the modification approved on March 18, 2005, for the referenced Impoundment Basin.

Based on the information provided in your submittal, the cutoff wall to be constructed around the entire sump area of the new pumping station is designed to preserve the integrity of the basin. Therefore, your request to construct the cutoff wall is hereby approved.

Please be advised that you are required to submit a cross section of stratigraphy at the Impoundment Basin. In addition, please include in the sampling analytical tables the exact depths for samples collected at each location. Also, data in the tables must be legible for the review.

Please reference your Agency Interest No.1708, Permit No. P-0112-A-1, and PER 20040008 on all future correspondence pertaining to this permit modification. If you have any questions regarding this matter, please contact Mr. Hoa Van Nguyen at (225) 219-3047.

Sincerely,


Chuck Carr Brown, Ph.D.
Assistant Secretary

hvn

c: Myrna Moline, OEA- ETD - SERO
Stephen Tassin, OEA-ETD



Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037
Tel 504/391-6314
Fax 504/391-6496

M. H. Burnside
Americas Regional Manager

May 31, 2005



ORONITE

Mr. Lenny Young, Administrator
Permits
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Subject:
Additional Information for Pump Station Expansion, Impoundment Basin
Activity # PER 2004 0008
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

Dear Mr. Young:

On May 18, 2005, representatives of Chevron Oronite Company LLC, met with representatives from LDEQ at the Oak Point Plant to discuss an alternate construction plan for the proposed pumping station at its Stormwater Impoundment Basin. The new pumping station will increase Oak Point's stormwater treatment and pumping capacity and help minimize plant flooding during heavy rain and hurricane conditions.

The meeting was preceded by a tour of the basin area. The proposed construction plan, project schedule, and the preliminary analytical data from the liner sampling were reviewed. A summary of the issues reviewed is attached.

With the construction equipment and material on stand-by at the site, Chevron respectfully requests LDEQ's approval to continue with this project as described in the attachment so that the improvements to the treatment system can be achieved for the 2005 hurricane season.

Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

May 31, 2005
Page 2

Hopefully, the site visit performed by Ms. Myrna Moline, Mr. Will Steele, and Mr. Stephen Tassin will assist in understanding the activities we have planned.

Should you have any questions or need further clarification please contact Troy Sampey of my staff at (504) 391-6314. Your assistance in this matter is greatly appreciated.



M. H. Burnside

c.c. Mr. Hoa Van Nguyen
Enclosure

Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037
Tel 504/391-6314
Fax 504/391-6496

M. H. Burnside
Americas Regional Manager

May 31, 2005



Mr. Lenny Young, Administrator
Permits
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Subject:
Additional Information for Pump Station Expansion, Impoundment Basin
Activity # PER 2004 0008
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

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Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

May 31, 2005
Page 2

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Should you have any questions or need further clarification please contact Troy Sampey of my staff at (504) 391-6314. Your assistance in this matter is greatly appreciated.

M. H. Burnside

MHB
c.c. Mr. Hoa Van Nguyen
Enclosure

DB 6/1/05
6/1/05
6/1/05

Pump Station Expansion, Impoundment Basin
 Solid Waste Permit No. P-0112-A-1
 Chevron Oronite Company, LLC
 Belle Chasse, Louisiana

May 31, 2005

Page 3

New Pump Station Foundation Information and Revised Installation Procedure

Chevron began the construction activities of the new pump station at the basin on April 28, 2005. Six of the eight caissons were installed to prepare for sampling activities that would begin on May 3, 2005. The locations of the final two caissons are located on the bank of the basin and not in the water as anticipated. These two caissons were to be installed after the sampling process was completed on the first six caissons. On May 3rd, activities began with the measuring of the deposited material thickness inside of the six caissons set in the basin. Once this thickness was determined, removal of the deposited material and at least one foot of natural soil bottom was performed so that confirmatory samples could be obtained. During collection of the soil samples, it became apparent that the 30 foot zone is closer to the surface than previously thought.

We feel that it is in the best interest of everyone that we modify our construction plan to preserve the integrity of the basin. After considering several alternatives, we believe that the following method will meet everyone's expectations. This method centers on the complete isolation of the construction area from the rest of the 30 foot zone. The installation of an interlocking steel sheet cutoff wall that locks into the lower clays would accomplish this task. Our geotechnical engineering consultant (Eustis Engineering) is providing assistance in the design of this stay-in-place cutoff box.

Most of the other elements of the original construction plan would not change. The principle difference is that the excavation for the sump will take place inside the cutoff box, rather than the open cut as we had initially planned.

Key elements of the construction plan are outlined below¹; the first three (3) items have been completed except as noted:

- Install eight (8) temporary 36" dia. caissons at the locations where pilings will be driven. The caissons will allow us to take soil samples and drive pilings in a clean environment (the two pile locations on the bank of the basin have not been installed to date).
- Evacuate the caissons to a depth of at least one (1) foot into the basin bottom.
- Obtain and test representative soil samples from each of the eight (8) caissons (samples have been obtained for the six (6) caissons located in the basin, a sample was taken between the location of the two piles that are to be installed on the bank of the basin).
- Install the 16" diameter containment pile (isolation casing) through the temporary caissons
- Material within the isolation casing will be removed and a two (2) foot thick bentonite plug will be placed at the bottom of the casing.
- Install the structural piles inside the environmental casings, grouting annular space with bentonite cement mixture
- *Install interlocking steel sheeting, forming a cutoff wall around the entire sump construction area (approximately 20'L x 20'W) and locking into the lower clays. The length of the steel*

1. Items in italics indicate revisions to the original construction plan

Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

May 31, 2005
Page 4

sheeting will be determined from the soil boring performed by our geotechnical engineering consultant, Eustis Engineering, on May 23, 2005

- Remove six (6) 36" dia. caissons. *The two remaining caissons to be placed on the basin bank will remain in place to assist in maintaining stability of the basin bank.*
- *Evacuate deposited materials and soil from the interior of the box as needed to install the pumping chamber (sump), approximately four (4) feet into the basin bottom.*
- *Install the sump in the prepared excavation within the cutoff box.*
- *Create an opening in the cutoff box for water to enter the pumping chamber. This will be done by driving the steel sheeting on the west wall (facing the interior of the basin) until it is flush with the bottom on the basin.*

We feel this method of construction will provide a safe work area for our stormwater expansion needs, while maintaining the integrity of the basin. This method also incorporates the use of accepted environmental migration barriers for the cessation of underground water flow.

Results from Pace Analytical Inc., of samples taken during the caisson installation, indicate that no results from inside of the caissons exceeded the RECAP standards with most results below detection levels. All detection limits are below RECAP standards². Because of the outcome of the samples taken, and since a sample was collected in the area between the remaining two caissons, we are proposing that there is not a need to collect any additional samples in the area of the two caissons to be installed, after at least two (2) feet of material is removed, prior to installation of the 16" diameter containment pile (isolation casing) through the permanent caissons.

1. Items in italics indicate revisions to the original construction plan
2. Only one (1) sample (a sample taken between the locations of the two piles to be driven on the basin bank) had a result slightly above the RECAP standard. This sample was run in triplicate, with the other two samples below the RECAP standards. The parameter, arsenic, was reported at 13.1 mg/Kg with the screening standard at 12 mg/Kg associated with direct contact. There is no direct contact with the sediments in the bottom of the basin; therefore the appropriate screening limit is 100 mg/Kg, well above the reported value. See Table 1 & 2 along with sample location map for additional information.

Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Activity # PER 2004 0008
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

Basin Soil Sampling Locations and Analytical Data

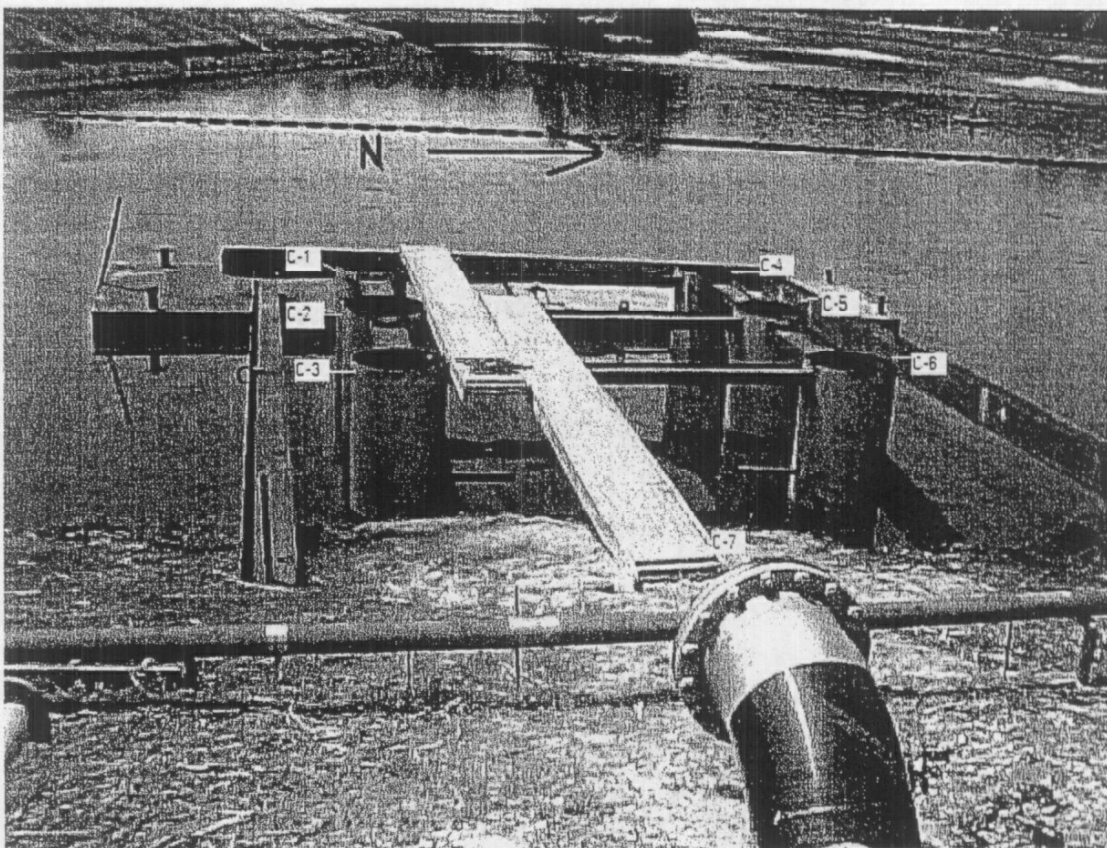


Table 1 Sediment samples and the associated analytes. Units are in mg/Kg.

Constituent	C1-SED01	C2-SED01	C3-SED01	C4-SED01	C5-SED01	C6-SED01	C7-SED01	C7-SED02	C7-SED03	Limiting RECAP Standard #N/A
Ammonia, Distilled	9.33	7.06	1.250 U	1.250 U	7.49	1.250 U	1.250 U	1.250 U	5.73	#N/A
Arsenic	1.54	1.6	1.7	2.33	2.23	2.83	4.75	2.65	13.1	12
Cadmium	0.097 U	0.074	0.131 U	0.144 U	0.144	0.146	0.172	0.135 U	0.282	20
Lead	3.1	3.46	3.05	4.8	4.75	4.43	8.43	8.08	9.61	100
Methanol	0.171 U	0.171 U	0.171 U	0.171 U	0.171 U	0.171 U	0.171 U	0.171 U	0.171 U	#N/A
Molybdenum	0.148 U	0.103 U	0.200 U	0.221 U	0.173 U	0.173 U	0.45	0.208 U	0.375	#N/A
Reactive Oxide	6.25 U	6.25 U	6.25 U	6.25 U	6.25 U	6.25 U	6.25 U	6.25 U	6.25 U	#N/A
Reactive Sulfide	12.5 U	12.5 U	12.5 U	84.2	12.5 U	130	12.5 U	12.5 U	12.5 U	#N/A
Zinc	16.8	20	17.5	25.4	27.5	23.5	56.6	56.5	49.4	2800

Notes

- (1) U indicates that the analyte was not detected at the listed detection limit.
 (2) Bold indicates above a RECAP Screening Standard (see Table 1 RECAP 20 October 2003). Only applies to those analytes listed on Table 1 RECAP.
 (3) The limiting screening limit under RECAP for arsenic is 12 mg/Kg. This value is associated with direct contact. There is no direct contact with the sediments in the bottom of the basin. Therefore the appropriate screening limit is 100 mg/kg.
 (4) #N/A indicates that no RECAP Screening Standard exist for this compound.

Table 2 Sediment samples and the associated analyses. Units are in ug/Kg. The U values are detection limits.

Constituent	C1-SED01	C2-SED01	C3-SED01	C4-SED01	C5-SED01	C6-SED01	C7-SED01	C7-SED02	C7-SED03	Limiting RECAP Standard
1,1,1,2-Tetrachloroethane	0.37 U	0.48 U	0.38 U	0.50 U	0.39 U	0.45 U	0.44 U	0.40 U	0.43 U	46
1,1,1-Trichloroethane (Methyl chloroform)	0.21 U	0.28 U	0.21 U	0.28 U	0.21 U	0.25 U	0.24 U	0.22 U	0.24 U	3978
1,1,2,2-Tetrachloroethane	0.53 U	0.68 U	0.55 U	0.72 U	0.56 U	0.64 U	0.62 U	0.58 U	0.61 U	5
1,1,2-Trichloroethane	0.31 U	0.40 U	0.32 U	0.42 U	0.33 U	0.38 U	0.38 U	0.33 U	0.36 U	8
1,1'-Biphenyl	120.00 U	120.00 U	120.00 U	120.00 U	120.00 U	120.00 U	120.00 U	120.00 U	120.00 U	187812
1,1-Dichloroethane	0.27 U	0.35 U	0.28 U	0.37 U	0.28 U	0.33 U	0.32 U	0.29 U	0.31 U	7526
1,1-Dichloroethene (Dichloroethylene)	0.32 U	0.41 U	0.33 U	0.43 U	0.34 U	0.39 U	0.37 U	0.34 U	0.37 U	85
1,2,4,5-Tetrachlorobenzene	56.20 U	56.20 U	56.20 U	56.20 U	56.20 U	56.20 U	56.20 U	56.20 U	56.20 U	8921
1,2,4-Trichlorobenzene	0.74 U	0.95 U	0.77 U	1.00 U	0.77 U	0.90 U	0.86 U	0.79 U	0.85 U	14110
1,2-Dibromo-3-chloropropane (DBCP)	1.50 U	1.83 U	1.55 U	2.03 U	1.57 U	1.82 U	1.75 U	1.59 U	1.72 U	10
1,2-Dichlorobenzene (o-Dichlorobenzene)	71.20 U	71.20 U	71.20 U	71.20 U	71.20 U	71.20 U	71.20 U	71.20 U	71.20 U	28623
1,2-Dichloroethane (Ethylene dichloride)	7.08	8.18	1.37	7.82	5.14	0.87 U	0.64 U	1.81	0.63 U	35
1,2-Dichloropropane	0.53 U	0.68 U	0.54 U	0.71 U	0.55 U	0.64 U	0.61 U	0.58 U	0.60 U	42
1,3-Dichlorobenzene (m-Dichlorobenzene)	71.20 U	71.20 U	71.20 U	71.20 U	71.20 U	71.20 U	71.20 U	71.20 U	71.20 U	2065
1,3-Dinitrobenzene (m-Dinitrobenzene)	61.90 U	61.90 U	61.90 U	61.90 U	61.90 U	61.90 U	61.90 U	61.90 U	61.90 U	250
1,4-Dichlorobenzene (p-Dichlorobenzene)	69.50 U	69.50 U	69.50 U	69.50 U	69.50 U	69.50 U	69.50 U	69.50 U	69.50 U	5737
2,2'-oxybis(1-Chloropropane)	154.00 U	154.00 U	154.00 U	154.00 U	154.00 U	154.00 U	154.00 U	154.00 U	154.00 U	800
2,3,4,6-Tetrachlorophenol	39.40 U	39.40 U	39.40 U	39.40 U	39.40 U	39.40 U	39.40 U	39.40 U	39.40 U	30653
2,4,5-Trichlorophenol	48.30 U	48.30 U	48.30 U	48.30 U	48.30 U	48.30 U	48.30 U	48.30 U	48.30 U	318799
2,4,6-Trichlorophenol	39.70 U	39.70 U	39.70 U	39.70 U	39.70 U	39.70 U	39.70 U	39.70 U	39.70 U	1307
2,4-Dichlorophenol	51.70 U	51.70 U	51.70 U	51.70 U	51.70 U	51.70 U	51.70 U	51.70 U	51.70 U	11704
2,4-Dimethylphenol	88.30 U	88.30 U	88.30 U	88.30 U	88.30 U	88.30 U	88.30 U	88.30 U	88.30 U	20092
2,4-Dinitrophenol	59.40 U	59.40 U	59.40 U	59.40 U	59.40 U	59.40 U	59.40 U	59.40 U	59.40 U	1700
2,4-Dinitrotoluene	59.80 U	59.80 U	59.80 U	59.80 U	59.80 U	59.80 U	59.80 U	59.80 U	59.80 U	1016
2,6-Dinitrotoluene	53.30 U	53.30 U	53.30 U	53.30 U	53.30 U	53.30 U	53.30 U	53.30 U	53.30 U	393
2-Butanone (Methyl ethyl ketone)	2.37 U	3.04 U	2.44 U	3.19 U	2.47 U	4.78	2.75 U	2.50 U	2.71 U	4993
2-Chloronaphthalene	68.20 U	68.20 U	68.20 U	68.20 U	68.20 U	68.20 U	68.20 U	68.20 U	68.20 U	497692
2-Chlorophenol (o-Chlorophenol)	71.70 U	71.70 U	71.70 U	71.70 U	71.70 U	71.70 U	71.70 U	71.70 U	71.70 U	1400
2-Methyl-1-propanol (iso-Butyl alcohol)	82.70 U	108.00 U	86.30 U	111.00 U	86.30 U	99.90 U	96.20 U	87.50 U	94.70 U	29923
2-Methylnaphthalene	105.00 U	105.00 U	105.00 U	105.00 U	105.00 U	105.00 U	105.00 U	105.00 U	105.00 U	1687
2-Nitroaniline (o-Nitroaniline)	37.70 U	37.70 U	37.70 U	37.70 U	37.70 U	37.70 U	37.70 U	37.70 U	37.70 U	1700
2-sec-Butyl 4,8-dinitrophenol (Dinoseb)	39.20 U	39.20 U	39.20 U	39.20 U	39.20 U	39.20 U	39.20 U	39.20 U	39.20 U	140
3,3'-Dichlorobenzidine	52.90 U	52.90 U	52.90 U	52.90 U	52.90 U	52.90 U	52.90 U	52.90 U	52.90 U	1785
3-Nitroaniline (m-Nitroaniline)	88.40 U	88.40 U	88.40 U	88.40 U	88.40 U	88.40 U	88.40 U	88.40 U	88.40 U	1700
4-Chloroaniline (p-Chloroaniline)	73.80 U	73.80 U	73.80 U	73.80 U	73.80 U	73.80 U	73.80 U	73.80 U	73.80 U	1517
4-Methyl-2-pentanone (MIBK)	1.71 U	2.19 U	1.78 U	2.30 U	1.78 U	2.06 U	1.98 U	1.81 U	1.96 U	6420
4-Nitroaniline (p-Nitroaniline)	103.00 U	103.00 U	103.00 U	103.00 U	103.00 U	103.00 U	103.00 U	103.00 U	103.00 U	1700
4-Nitrophenol (p-Nitrophenol)	74.30 U	74.30 U	74.30 U	74.30 U	74.30 U	74.30 U	74.30 U	74.30 U	74.30 U	2846
Acenaphthene	48.50 U	48.50 U	48.50 U	48.50 U	48.50 U	48.50 U	48.50 U	48.50 U	48.50 U	215307
Acenaphthylene	58.50 U	58.50 U	58.50 U	58.50 U	58.50 U	58.50 U	58.50 U	58.50 U	58.50 U	88415
Acetone (2-Propanone, Dimethyl ketone)	10.3	15.8	5.42	25.4	5.81	15.7	5.23	6.83	6.69	1545
Aniline (Benzeneamine)	64.40 U	64.40 U	64.40 U	64.40 U	64.40 U	64.40 U	64.40 U	64.40 U	64.40 U	65
Anthracene	46.30 U	46.30 U	46.30 U	46.30 U	46.30 U	46.30 U	46.30 U	46.30 U	46.30 U	121243
Benzene	0.36 U	0.46 U	0.37 U	0.48 U	0.37 U	0.43 U	0.41 U	0.38 U	0.41 U	51
Benzofuran	47.00 U	47.00 U	47.00 U	47.00 U	47.00 U	47.00 U	47.00 U	47.00 U	47.00 U	2668
Benzofluoranthene	50.60 U	50.60 U	50.60 U	50.60 U	50.60 U	50.60 U	50.60 U	50.60 U	50.60 U	330
Benzofluoranthene	90.20 U	90.20 U	90.20 U	90.20 U	90.20 U	90.20 U	90.20 U	90.20 U	90.20 U	2868
Bis(2-Chloroethyl) ether	131.00 U	131.00 U	131.00 U	131.00 U	131.00 U	131.00 U	131.00 U	131.00 U	131.00 U	28794
Bis(2-Ethoxyethyl)phthalate	144.00 U	144.00 U	144.00 U	144.00 U	144.00 U	144.00 U	144.00 U	144.00 U	144.00 U	330
Bromodichloromethane	99.30 U	99.30 U	99.30 U	99.30 U	99.30 U	99.30 U	99.30 U	99.30 U	99.30 U	79135
Bromofluoromethane	0.28 U	0.36 U	0.29 U	0.38 U	0.29 U	0.34 U	0.33 U	0.30 U	0.32 U	918
Bromomethane (Methyl bromide)	0.63 U	0.81 U	0.65 U	0.85 U	0.66 U	0.76 U	0.73 U	0.67 U	0.72 U	1761
Butylbenzylphthalate	0.58 U	0.75 U	0.60 U	0.78 U	0.61 U	0.71 U	0.68 U	0.62 U	0.67 U	40
Carbon disulfide	70.40 U	70.40 U	70.40 U	70.40 U	70.40 U	70.40 U	70.40 U	70.40 U	70.40 U	222274
	0.21 U	0.27 U	0.22 U	0.29 U	0.22 U	5.01	0.25 U	0.23 U	0.24 U	10548

Table 2 Sediment samples and the associated analytes. Units are in ug/Kg. The U values are detection limits.

Constituent	C1-SED01	C2-SED01	C3-SED01	C4-SED01	C5-SED01	C6-SED01	C7-SED01	C7-SED02	C7-SED03	Limiting RECAP Standard
Carbon tetrachloride	2.44	2.8	1.17	2.83	2.19	0.71 U	0.68 U	1.47	0.67 U	114
Chlorobenzene	0.35 U	0.45 U	0.38 U	0.47 U	0.37 U	0.43 U	0.41 U	0.37 U	0.40 U	2859
Chloroethane	0.66 U	0.85 U	0.68 U	0.89 U	1.52	0.80 U	0.77 U	0.70 U	0.75 U	35
Chloroform	3.12	4.29	0.655	3.89	2.92	0.31 U	0.30 U	1.36	0.29 U	286
Chloromethane (Methyl chloride)	0.27 U	0.35 U	0.28 U	0.36 U	0.28 U	0.33 U	0.31 U	0.29 U	0.31 U	100
Chrysene	57.10 U	57.10 U	57.10 U	57.10 U	57.10 U	57.10 U	57.10 U	57.10 U	57.10 U	76342
cis-1,2-Dichloroethene	0.29 U	0.37 U	0.30 U	0.39 U	0.30 U	0.33 U	0.33 U	0.30 U	0.33 U	491
cis-1,3-Dichloropropene	0.24 U	0.30 U	0.24 U	0.32 U	0.25 U	0.29 U	0.28 U	0.25 U	0.27 U	#N/A
Dibenz(a,h)anthracene	59.30 U	59.30 U	59.30 U	59.30 U	59.30 U	59.30 U	59.30 U	59.30 U	59.30 U	330
Dibenzofuran	49.10 U	49.10 U	49.10 U	49.10 U	49.10 U	49.10 U	49.10 U	49.10 U	49.10 U	23778
Dibromochloromethane	0.25 U	0.32 U	0.25 U	0.33 U	0.26 U	0.30 U	0.29 U	0.26 U	0.28 U	1009
Dibutyltinolate	57.20 U	57.20 U	57.20 U	57.20 U	57.20 U	57.20 U	57.20 U	57.20 U	57.20 U	359806
Dimethylphthalate	48.10 U	48.10 U	48.10 U	48.10 U	48.10 U	48.10 U	48.10 U	48.10 U	48.10 U	1316519
Di-n-octylphthalate	54.40 U	54.40 U	54.40 U	54.40 U	54.40 U	54.40 U	54.40 U	54.40 U	54.40 U	3514213
Ethylbenzene	0.37 U	0.47 U	0.38 U	0.49 U	0.38 U	0.44 U	0.43 U	0.39 U	0.42 U	19241
Fluoranthene	70.80 U	70.80 U	70.80 U	70.80 U	70.80 U	70.80 U	70.80 U	70.80 U	70.80 U	1213030
Fluorene	44.10 U	44.10 U	44.10 U	44.10 U	44.10 U	44.10 U	44.10 U	44.10 U	44.10 U	225505
Hexachlorobenzene	72.40 U	72.40 U	72.40 U	72.40 U	72.40 U	72.40 U	72.40 U	72.40 U	72.40 U	1992
Hexachlorobutadiene	81.50 U	81.50 U	81.50 U	81.50 U	81.50 U	81.50 U	81.50 U	81.50 U	81.50 U	5480
Hexachlorocyclopentadiene	109.00 U	109.00 U	109.00 U	109.00 U	109.00 U	109.00 U	109.00 U	109.00 U	109.00 U	9405
Hexachlorocyclopentadiene	66.80 U	66.80 U	66.80 U	66.80 U	66.80 U	66.80 U	66.80 U	66.80 U	66.80 U	2161
Hexachloroethane	56.80 U	56.80 U	56.80 U	56.80 U	56.80 U	56.80 U	56.80 U	56.80 U	56.80 U	2882
Indeno(1,2,3-cd)pyrene	66.80 U	66.80 U	66.80 U	66.80 U	66.80 U	66.80 U	66.80 U	66.80 U	66.80 U	584
Isophorone	0.54 U	1.48	1.05	0.73 U	0.56 U	0.65 U	0.63 U	0.57 U	0.62 U	120847
m,p-Xylene	0.23 U	0.29 U	0.23 U	0.30 U	0.24 U	0.27 U	0.28 U	0.24 U	0.26 U	77
Methyl tert-butyl ether (MTBE)	1.08	1.21	0.29 U	1.45	1	1.11	0.33 U	1.05	0.33 U	17
Methylene chloride (Dichloromethane)	165.00 U	165.00 U	165.00 U	165.00 U	165.00 U	165.00 U	165.00 U	165.00 U	165.00 U	1452
Naphthalene	109.00 U	109.00 U	109.00 U	109.00 U	109.00 U	109.00 U	109.00 U	109.00 U	109.00 U	330
Nitrobenzene	63.20 U	63.20 U	63.20 U	63.20 U	63.20 U	63.20 U	63.20 U	63.20 U	63.20 U	330
N-Nitroso-di-n-propylamine	60.70 U	60.70 U	60.70 U	60.70 U	60.70 U	60.70 U	60.70 U	60.70 U	60.70 U	2128
N-Nitrosodiphenylamine (Diphenylamine)	0.19 U	0.24 U	0.19 U	0.25 U	0.20 U	0.23 U	0.22 U	0.20 U	0.21 U	#N/A
o-Xylene	70.30 U	70.30 U	70.30 U	70.30 U	70.30 U	70.30 U	70.30 U	70.30 U	70.30 U	1700
Pentachlorophenol	48.10 U	48.10 U	48.10 U	48.10 U	48.10 U	48.10 U	48.10 U	48.10 U	48.10 U	684569
Phenanthrene	51.80 U	51.80 U	51.80 U	51.80 U	51.80 U	51.80 U	51.80 U	51.80 U	51.80 U	10805
Phenol	60.90 U	60.90 U	60.90 U	60.90 U	60.90 U	60.90 U	60.90 U	60.90 U	60.90 U	110818
Pyrene	0.29 U	0.38 U	0.30 U	0.40 U	0.31 U	0.36 U	0.34 U	0.31 U	0.34 U	11199
Styrene	0.24 U	0.31 U	0.25 U	0.33 U	0.25 U	0.29 U	0.28 U	0.26 U	0.28 U	178
Tetrachloroethene (Perchloroethylene)	1.12	2.43	1.77	0.29 U	1.31	1.77	0.25 U	0.23 U	0.24 U	19728
Toluene	0.32 U	0.41 U	0.33 U	0.44 U	0.34 U	0.39 U	0.38 U	0.34 U	0.37 U	769
trans-1,2-Dichloroethene	0.48 U	0.61 U	0.49 U	0.64 U	0.50 U	0.56 U	0.55 U	0.50 U	0.55 U	#N/A
trans-1,3-Dichloropropene	0.36 U	0.47 U	0.37 U	0.48 U	0.38 U	0.44 U	0.42 U	0.36 U	0.42 U	73
Trichloroethene (Trichloroethylene)	0.31 U	0.40 U	0.32 U	0.42 U	0.33 U	0.38 U	0.38 U	0.33 U	0.36 U	36675
Trichlorofluoromethane (Freon 11)	0.26 U	0.33 U	0.27 U	0.35 U	0.27 U	0.31 U	0.30 U	0.27 U	0.30 U	13
Vinyl chloride (Chloroethene)										

Notes

- (1) U indicates that the analyte was not detected at the listed detection limit.
- (2) Bold indicates above a RECAP Screening Standard (see Table 1 RECAP 20 October 2003). Only applies to those analytes listed on Table 1 RECAP.
- (3) #N/A indicates that no RECAP Screening Standard exist for this compound.

Chevron Oronite Company, LLC
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M. H. Burnside
Americas Regional Manager

April 5, 2005



ORONITE

10054 542341

Mr. Chuck Carr Brown, Ph.D., Assistant Secretary
Permits
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Subject:
Sampling and Analysis Plan for Pump Station Expansion, Impoundment Basin
AI# 1708 / PER 2004 0008
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

Dear Mr. Brown:

In accordance with the Louisiana Department of Environmental Quality's (LDEQ) letter dated March 18, 2005, granting conditional approval for a minor permit modification to install a new pump station located within Chevron Oronite Company LLC, Oak Point Plant's Impoundment Basin, we are submitting three copies of the required Sampling and Analysis Plan. We are scheduled to mobilize equipment and begin construction the week of April 18, 2005.

Should you have any questions or need further clarification please contact Troy Sampey of my staff at (504) 391-6314. Your assistance in this matter is greatly appreciated.

M. H. Burnside / R.E. Reulm 4/5/05

M. H. Burnside

c.c. Mr. Hoa Van Nguyen
Enclosure

TECHNICAL SAMPLING AND ANALYSIS PLAN

Prepared for

**CHEVRON ORONITE COMPANY, LLC
INSTALLATION OF NEW PUMPING STATION
STORMWATER IMPOUNDMENT BASIN
BELLE CHASSE, LOUISIANA**

**LDEQ AI # 1708/PER 2004 0008
Solid Waste Permit No.: P- 0112-A-1**

5 April 2005

Prepared by

**TtEC
759 South Federal Highway, Suite 100
Stuart, Florida 34994-2936**

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1.0 INTRODUCTION

This Technical Sampling and Analysis (TSA) Plan has been developed for the sampling activities to be conducted inside caissons, which will be installed in the Stormwater Impoundment Basin at the Chevron Oronite Company, LLC (ChevronTexaco) Oak Point facility located in Belle Chasse, Louisiana. This TSA Plan was prepared in accordance with the letter dated 18 March 2005 from Dr. Brown of the Louisiana Department of Environmental Quality (LDEQ). The TSA presents a highly focused sampling and analysis protocol. This is based upon the applicable portions of the LDEQ, Risk Evaluation/Corrective Action Program (RECAP) Appendix B, Sections 2.4(1) and Sections 2.4(3).

2.0 BACKGROUND

ChevronTexaco plans to install a new pumping station in the Stormwater Impoundment Basin. The pumping station will be mounted on a platform that is supported by eight (8) pilings. Each of these pilings will be driven to a depth that is approximately 50 feet below land surface. These pilings will be driven through the bottom of the Stormwater Impoundment Basin.

The basin is an integral part of the Oak Point Plant Stormwater management system. The basin bottom is native clay and the basin was installed in a geological unit often called the "recent clayey deposits." Another geological unit known as the "lower sands" underlies the recent clayey deposits. The pilings will be driven through the recent clayey deposits and into the lower sands.

ChevronTexaco and the LDEQ developed a plan to prevent the introduction of storm-water sludge into the lower sands during the pile driving process. One element of that plan involves placing a 36 inch caisson one-foot into the recent clayey deposits before installing the pilings. After the caisson is in place, ChevronTexaco will evacuate material from inside the caisson. This material consists of: approximately two feet of water, approximately three feet of storm-water sludge, and one-foot of clay.

Tetra Tech EC, Inc. (TtEC) will estimate the depth of the storm-water sludge and collect samples of the clay after the material from inside the caisson has been removed. The clay samples will be sent to Pace Analytical Services, Inc. (PACE) for analysis.

ChevronTexaco plans to install the eight (8) piles in three days. Six (6) of the eight (8) caissons will be welded together, with steel supports, to form the grid pattern required for the six structural piles located farthest west of the basin bank. The six caisson grid pattern will be set into the basin corresponding to the structural pile layout. TtEC will measure the depth of the storm-water sludge in each of the six caissons. At the end of this activity, the material will be evacuated out of the first caisson. TtEC will then collect samples of the clay from the first caisson. Sampling the clay from the remainder of the caissons will occur after each caisson has been evacuated. The remaining two

caissons will be installed upon completion of the first six. Depth of the storm-water sludge will be determined in these last two caissons and then sampled once each caisson has been evacuated.

3.0 CLAY ASSESSMENT

Clay samples will be collected and analyzed to assess whether the clay has been impacted by constituents of concern (COC) in the area of the proposed pillings. The clay samples will be analyzed by a certified laboratory (i.e., PACE) in accordance with RECAP protocols.

3.1 CLAY SAMPLING ACTIVITIES

Storm-Water Sludge Depth: Field personnel will secure a measuring tape (thin walled water level meter tape) along the outside of a new clean 1 inch diameter, ten feet long section of PVC pipe. The PVC pipe will be driven by hand pressure through the water/sludge material until the clay bottom is encountered. The PVC pipe will be removed from inside the caisson and the thickness of the sludge will be recorded from the measuring tape. The measuring tape will be wiped of storm-water sludge prior to introduction into the next caisson.

Clay Sampling: A clean, new 4 inch diameter protective PVC pipe will be inserted inside of the evacuated 36 inch caisson to prevent sludge/water seepage, if any, from potentially contaminating the sample that will be collected. Sludge/water material that entered the protective pipe will be removed from the bottom of the protective pipe before collecting the sample of the clay bottom. A sampling device (slam bar) will be carefully installed inside the protective sampling pipe. The slam bar will be hammered approximately 12 inches into the clay material. The sample will be collected within the acetate liner inside the slam-bar sampling device. The acetate liner will be removed from the sampling device once the device is removed from the borehole. The liner will be cut along its length and the clay will be placed into the appropriate sample containers. The sampling device will be decontaminated prior to collecting a sample from each caisson.

Each clay sample will be placed in laboratory supplied containers or Encore samplers (VOCs) and immediately placed in a cooling chest with containerized ice. Field personnel will use new, clean disposable gloves to collect the samples. The sample container(s) will be labeled with the following information: sample identification, date, time, name of sampler, and laboratory analyses required. A chain-of-custody form will be completed and will accompany the samples under strict chain-of-custody protocol to PACE for the required analysis.

Sample collection will occur in the following order:

1. Volatile Organic Compounds (8260)
2. Methanol (8015M)
3. Semi-volatile Organic Compounds (8270)
4. Ammonia (EPA 350.02)
5. Reactive Cyanide (SW 7.3.3.2)
6. Reactive Sulfide (SW 7.3.4.2)
7. pH (9045)
8. Metals

3.2 SOIL LABORATORY ANALYSIS

Clay samples will be collected from inside of each caisson. The clay samples will be submitted to PACE in St. Rose, Louisiana, and analyzed for the parameters listed on the following table.

Compound	Test Method
Methanol	SW 8015M
Arsenic	SW 6010 Metal
Cadmium	SW 6010 Metal
Lead	SW 6010 Metal
Molybdenum	SW 6010 Metal
Zinc	SW 6010 Metal
Volatile Organic Compounds	SW8260 Volatile
Semi-volatile Organic Compounds	SW8270 Semi-volatile
Ammonia	EPA 350.2
Reactive Cyanide	SW 7.3.3.2
Reactive Sulfide	SW 7.3.4.2
pH	SW 9045

4.0 DATA MANAGEMENT AND EVALUATION

The procedures used to conduct sampling activities will either be recorded in a bound field logbook with sequentially numbered pages or on field data sheets/sampling logs. Data will be recorded by an environmental professional in indelible ink.

Information on the custody, transfer, handling, and shipping of samples will be recorded on a Chain of Custody (COC) form. A COC form will be prepared and signed by an environmental professional and laboratory personnel when the samples are relinquished to the laboratory. TtEC will retain a copy of the COC form. The laboratory will keep the original COC form, which will be included in the laboratory report. The

samples will be submitted to PACE, which is a laboratory certified by the LDEQ. Analytical methods were selected to obtain the laboratory practical quantitation limits (PQL) and performance standards required in the RECAP. The PQL for the samples will be equal to or less than applicable RECAP Standard, unless these limits cannot be achieved by the laboratory. Qualified personnel will conduct laboratory analyses, and the laboratory instruments will be calibrated and operated in accordance with the manufacturers, and LDEQ protocols.

4.1 QUALITY ASSURANCE/QUALITY CONTROL DATA

The Quality Assurance/Quality Control (QA/QC) protocols for the site will be implemented to ensure the validity of analytical results. QA/QC samples will be collected and analyzed along with soil samples to evaluate sample collection, handling, and analytical techniques.

One equipment (rinsate) blank will be prepared prior to collection of the first sample. Equipment blanks are samples of distilled water poured over/through the sampling equipment after the decontamination process or prior to sampling if new clean equipment is used for sampling. The rinsate sample is used to evaluate the possibility of cross-contamination between samples by evaluating the effectiveness of the decontamination process or the cleanliness of the new clean equipment. Equipment blanks will be collected at a rate of one per eight samples. The equipment blanks will be analyzed for the same constituents as the samples:

One field blank will be collected per day. The field blank sample is collected in the general area where the clay samples are collected. Distilled water is poured into the sample containers. The results indicate whether airborne contaminants have possibly contaminated the soil samples.

Duplicate samples will be collected at a rate of one per eight samples. These samples will be prepared from equal portions of sample aliquots and their identifications will be disguised. The duplicate samples will be analyzed for the same constituents as the original samples. These data will be used to assess sample collection and analytical protocols.

Matrix spike/matrix spike duplicate (MS/MSD) samples will be collected to assess laboratory analytical techniques. MS/MSD samples are samples that have been divided into portions during the sampling process. MS/MSD samples will be prepared at a rate of one per eight samples. The MS/MSD samples will be analyzed for the same parameters as the primary sample.

A trip blank will be prepared by the analytical laboratory and will accompany the sample containers in the cooling chest. The trip blank will be analyzed for volatile organic compounds to assess if potential contamination occurred during sample shipment.

4.2 DATA USABILITY

Laboratory analytical reports will be evaluated upon receipt to ensure the accuracy of analytical data. The sample analyses will be conducted in accordance with the latest approved edition of EPA SW846, Test Methods of Evaluating Solid Waste and other pertinent EPA publications and methods unless otherwise specified by the LDEQ.

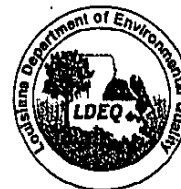
5.0 REPORT

A brief report will be prepared that presents the background associated with the Stormwater Impoundment Basin. This background will focus on the installation of the new pumping station and the dialogue that evolved between ChevronTexaco and the LDEQ regarding the need to sample the clay. The report will also detail the sampling and analytical methodology. A section on findings will present the field logs associated with the determination of the storm-water sludge depth. The report will contain two tables. One table will present the list of analytes analyzed by PACE. The other table will present a list of maximum detected concentrations by analyte and clay sample. The laboratory report will be presented as an Appendix.



State of Louisiana

Department of Environmental Quality



KATHLEEN BABINEAUX BLANCO
GOVERNOR

MIKE D. McDANIEL, Ph.D.
SECRETARY

MAR 18 2005

CERTIFIED MAIL 7003 2260 0000 5816 7373
RETURN RECEIPT REQUIRED

Mr. M. H. Burnside
Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chase, LA 70037

RE: Minor Modification for Pump Station Expansion
Impoundment Basin
P-0112-A-1
AI# 1708 / PER 20040008

Dear Mr. Burnside:

We are in receipt of your permit modification dated November 12, 2004, and its addendum dated January 31, 2005, requesting to construct a new pumping station at the referenced Impoundment Basin.

Based on your submittals, the new pumping station will be located within the Impoundment Basin. In addition, the intake structure for the station will be founded on eight steel pipe piles driven through the in situ liner of the Impoundment Basin to elevation -50 feet. According to your proposal, the foundation installation procedure has been addressed and the following issues have been agreed upon:

1. Chevron has agreed to complete confirmatory sampling within the excavation areas for the proposed pilings.
2. Chevron has agreed to report the results of the confirmatory soil sampling and submit findings to the Department within 90 days of the sampling.

Therefore, your request for the permit modification is hereby approved with the conditions that:

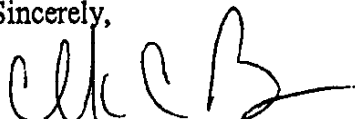
1. Chevron should provide a sampling plan to detail sampling protocol and QA/QC. Sample collection, preservation, handling and analyses must be in accordance with SW-846 methods and guidance in RECAP Appendix B.
2. Chevron should provide waste characterization and/or disposal in accordance with SW regulations.

Chevron Oronite
AI#1708 / PER20040008
Page 2

3. Confirmatory sampling should include all VOCs and SVOCs. Metals, sulfide, cyanide and pH may be excluded if not part of waste stream or sludges or used for characterization of disposal.
4. The excavation within each caisson area must continue to a depth that all wastes/sludges and at least 12" or more into the clay bottom have been cleared of contamination.

Please reference your Agency Interest No.1708, Permit No. P-0112-A-1, and PER 20040008 on all future correspondence pertaining to this permit modification. If you have any questions regarding this matter, please contact Mr. Hoa Van Nguyen at (225) 219-3047 with the Water and Waste Permits Division.

Sincerely,



Chuck Carr Brown, Ph.D.
Assistant Secretary

hvn

c: Myrna Moline OEA- ETD - SERO

Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037
Tel 504/391-6314
Fax 504/391-6496

M. H. Burnside
Americas Regional Manager

January 31, 2005



Mr. Lenny Young, Administrator
Permits
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Subject:
Additional Information for Pump Station Expansion, Impoundment Basin
Activity # PER 2004 0008
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

Dear Mr. Young:

On January 19, 2005, Chevron Oronite Company LLC, Oak Point Plant, met with LDEQ to discuss Chevron's desire to construct a new pumping station at its Stormwater Impoundment Basin. This project is an effort to increase Oak Point's treatment and pumping capacity to help minimize plant flooding during heavy rain and hurricane conditions. Based on that meeting, the following additional information is provided.

Since 1943 Chevron Oronite Company's LLC, Oak Point Plant, has been located in Belle Chasse, Louisiana. Located on approximately 100 acres and employing over 350 people, the plant is one of the largest and most advanced producers of high-quality blended fuel and lubricant additives in the world, serving both domestic and international markets.

Oak Point's water treatment system is segregated into two systems: a stormwater system and a process wastewater system. In 2003, Oak Point installed equipment which increased the stormwater treatment capacity to 5,000 gallons per minute (GPM). The limiting factor for the stormwater system at this time is the ability of the pumping station to supply enough water to the treatment units. The current capacity is approximately 2,500 GPM. To fully utilize the additional treatment capability, the pumping capacity at the Basin must be increased to 5,000 GPM.

Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

January 31, 2005

Page 2

Three options were considered for increasing pumping capacity: a) install a larger pump in the existing station; b) add an additional pump to the existing station; c) construct a new pumping station. Based on property limitations, existing structural integrity, and environmental concerns, the best option is a new pumping station as described in this letter. The new station will be installed approximately 35 feet north of the existing and be of similar design. Attached drawings MB-03034-855 & MB-03034-856 indicate the proposed location and support details for the new station. Also enclosed is Attachment 1 "Vicinity Map" and Attachment 2 and 3 "Site Location Maps".

Chevron respectfully requests LDEQ approval to implement the above-mentioned improvements.

Please note Oak Point received its 10 year Solid Waste Permit for the impoundment basin on July 28, 1986. On January 31, 1994, a Mandatory Permit Modification of the 1986 permit was submitted. No voluntary modifications were proposed with the mandatory modification and the operation of the unit was essentially the same as described in the original application. We are submitting this information based on the 1986 solid waste permit, item number 7, "No modifications to a site, facility, process or disposal method or operation may be effected without prior approval of the Secretary in accordance with Section 6.3.7. of the SWRR" and LAC 33:VII.5 17 "Permit Modifications" of the 1994 regulations which was used to create the 1994 Mandatory Modification.

Should you have any questions or need further clarification please contact Troy Sampey of my staff at (504) 391-6314. Your assistance in this matter is greatly appreciated.



M. H. Burnside

c.c. Mr. Hoa Van Nguyen
Enclosure

Pump Station Expansion, Impoundment Basin
 Solid Waste Permit No. P-0112-A-1
 Chevron Oronite Company, LLC
 Belle Chasse, Louisiana

January 31, 2005

Page 3

New Pump Station Foundation Installation Procedure

The construction of a new pumping station at the Stormwater Impoundment Basin for Chevron Oronite's LLC, Oak Point Plant, will be a 5,000 gallon per minute facility intended to support Chevron's ongoing efforts to increase the capacity of the stormwater treatment system. The intake structure will be founded on a maximum of eight steel pipe pile driven within a steel containment pile.

1. To assist in creating a dry environment for the installation of the structural pilings, a 36" diameter caisson would be temporarily installed at each pile location.
2. The caisson will be set approximately 12" into the clay liner of the impoundment basin.
3. The inside of each caisson would be cleared of sludge and approximately 12" of the clay pond bottom.
4. Upon completion of step 3, a 16" containment pile (isolation casing) will be installed inside of the caisson to an elevation of -25 feet.
5. Material within the isolation casing will be removed and a two (2) foot thick bentonite plug will be placed at the bottom of the casing.
6. The structural pile will be driven through the bentonite plug to a tip elevation of -50'.
7. The isolation casing will remain in place with the void area between the 16" isolation casing and the structural pile grout sealed with a cement/bentonite grout.
8. The 36" caisson will be removed.

Note: Confirmatory samples at each pile location will be taken upon completion of step 3. Each sample will be analyzed for the indicator parameters listed below. A report containing the sampling information will be sent to LDEQ within 90 days of obtaining the last confirmatory sample.

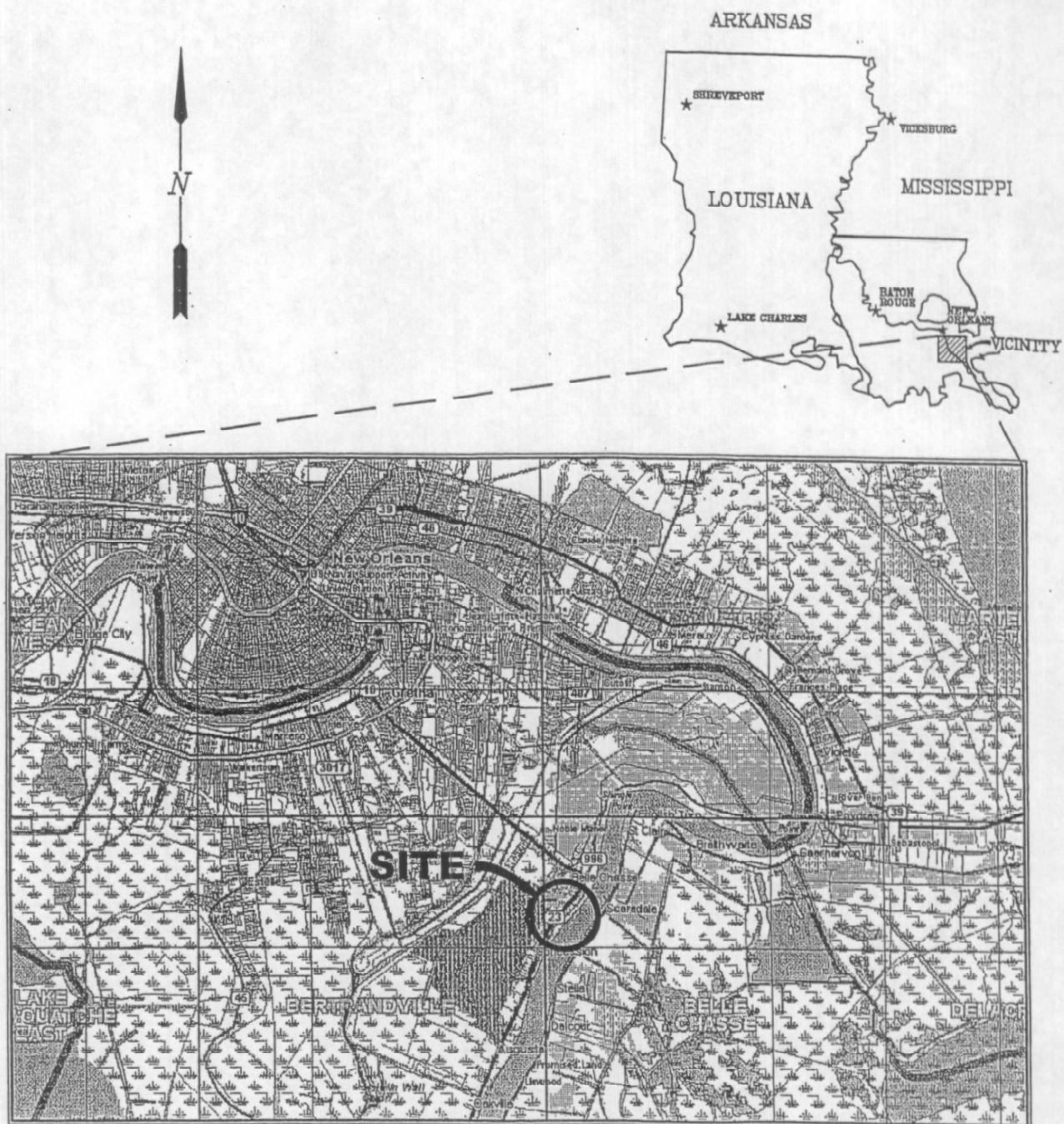
Parameter Name	Method
Methanol	SW 8015M
Arsenic	SW 6010 Metal
Cadmium	SW 6010 Metal
Lead	SW 6010 Metal
Molybdenum	SW 6010 Metal
Zinc	SW 6010 Metal
2-Butanol (sec-Butyl alcohol)	SW 8260 Volatile
Cyclohexane	SW 8260 Volatile
Ethylbenzene	SW 8260 Volatile
Hexane	SW 8260 Volatile

Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

January 31, 2005

Page 4

Isopropylbenzene	SW 8260 Volatile
1,2,4-Trimethylbenzene	SW 8260 Volatile
M,p-Xylene	SW 8260 Volatile
o-Xylene	SW 8260 Volatile
Naphthalene	SW 8270 Semi Volatile
N-nitrosodiphenylamine	SW 8270 Semi Volatile
Phenol	SW 8270 Semi Volatile
Ammonia	EPA 350.2
Reactive Cyanide	SW 7.3.3.2
Reactive Sulfide	SW 7.3.4.2
pH	SW 9045



VICINITY MAP

ATTACHMENT 1

CHEVRON ORONITE COMPANY, LLC
BELLE CHASSE LOUISIANA

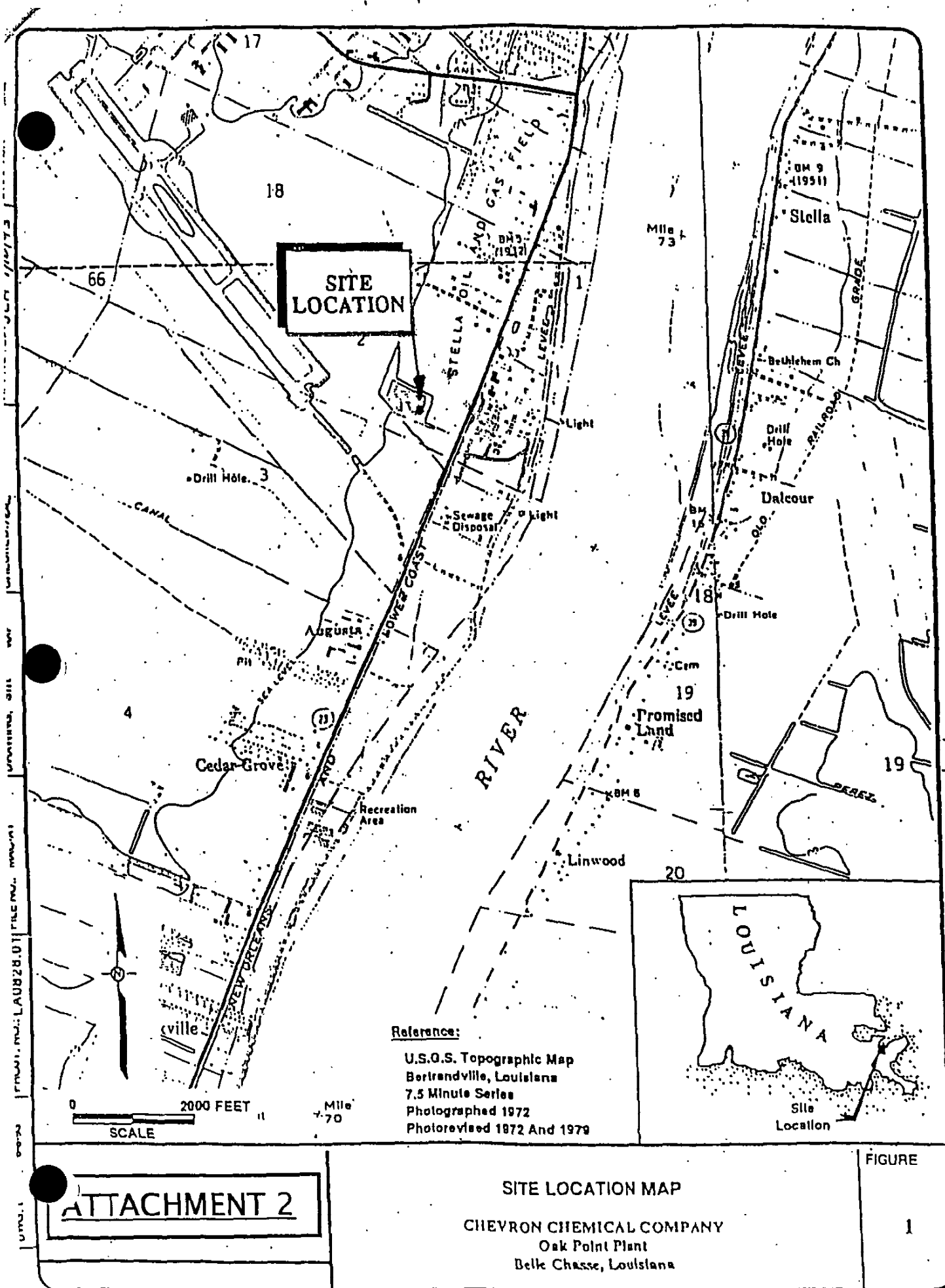
CHEVRON ORONITE COMPANY

VICINITY MAP

5899-1

DATE MARCH '02
DESIGN _____
DRAWN _____
CHECK _____
CONTRACT _____
SHEET No. _____

1 OF

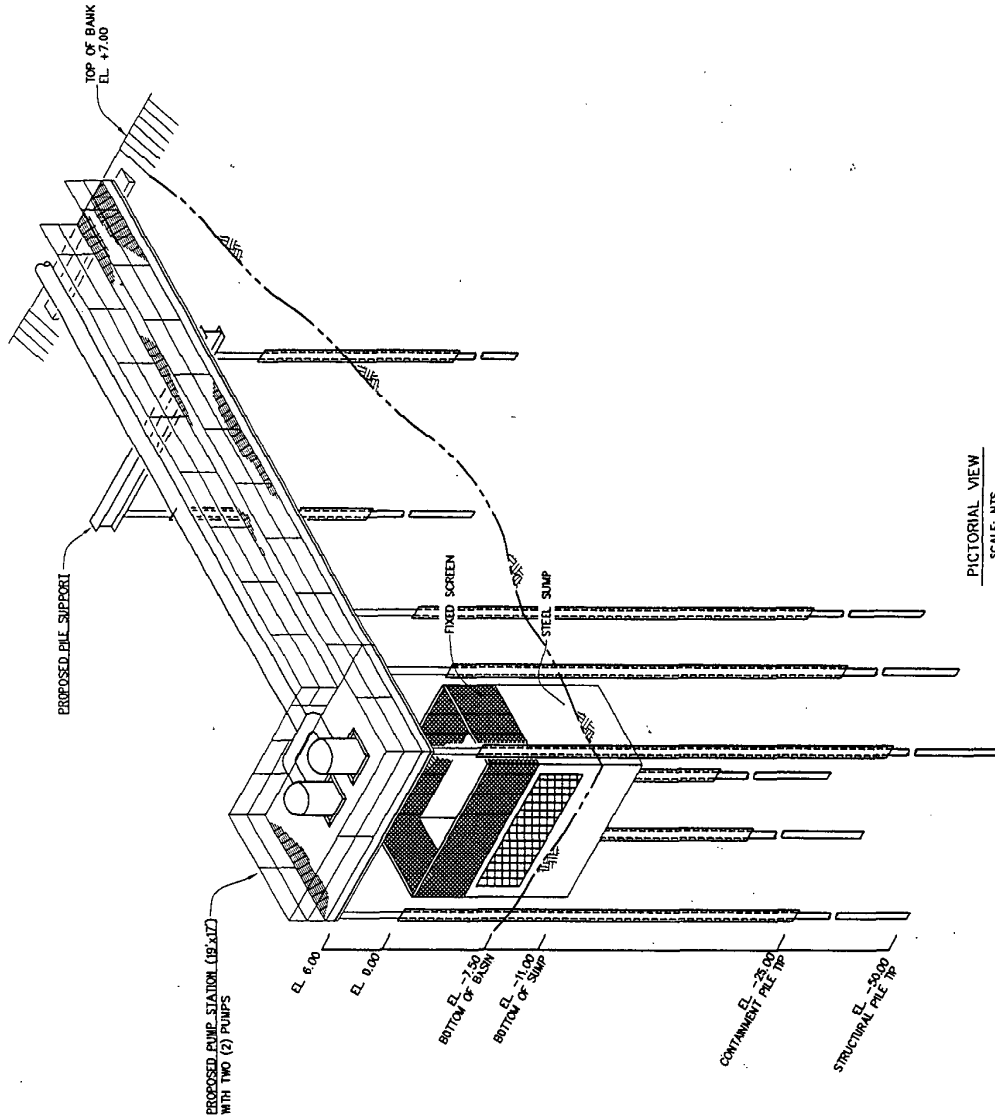


ATTACHMENT 2

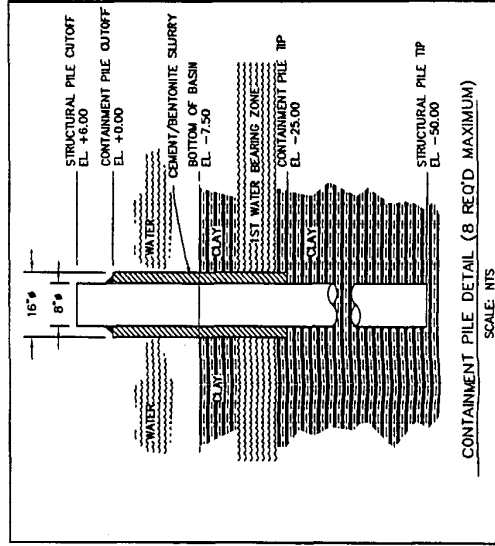
SITE LOCATION MAP
 CHEVRON CHEMICAL COMPANY
 Oak Point Plant
 Belk Chasse, Louisiana

FIGURE

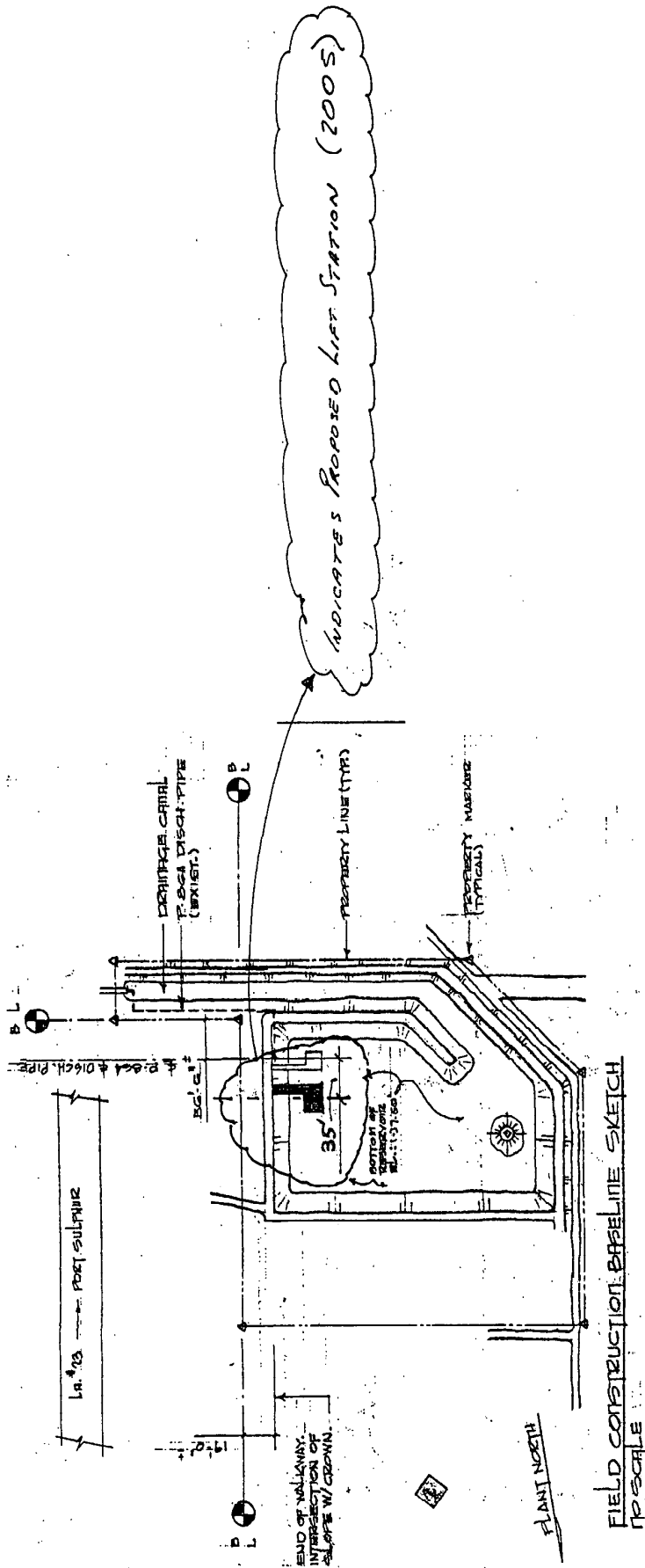
1



ELEVATIONS REFERENCED TO PLANT DATUM
TOP OF EXISTING PUMPING STATION EL. $\pm 6.00'$



Chevron Chemical Company Oronite Additives Division <small>PERMITTING DIVISION</small>		PERMIT SKETCH PROPOSED PUMPING STATION STORMWATER SYSTEM UPGRADE 2005 DATE: 1/22/06 DRAWN BY: [Signature] CHECKED BY: [Signature]
SCALE: 3/16" = 1'-0" DATE: 1/22/06 DRAWN BY: [Signature]	Q 1 MB-03034-856	ISSUED FOR PERMIT



FIELD CONSTRUCTION BASELINE SKETCH
NO SCALE

		Chevrone Chemical Company Oroville Additives Division EXISTING CONSTRUCTION	PERMIT SKETCH PROPOSED PUMPING STATION STORMWATER SYSTEM UPGRADE 2005 OAK POINT
SCALE: 1/8" = 1'-0" DATE: 1/22/05 DRAWN BY: J. HARRIS		DATE: 1/22/05 CHECKED BY: J. HARRIS	PROJECT NO.: MB-03034-855 REV: A
ISSUED FOR PERMIT		0 1 2	

Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037
Tel 504/391-6314
Fax 504/391-6496

M. H. Burnside
Americas Regional Manager

October 21, 2004



ORONITE

Mr. Michael Vince, Administrator
Permits
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Subject:
Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

Dear Mr. Vince:

Chevron Oronite Company, LLC (Chevron), is proposing the construction of a new pumping station at the Stormwater Impoundment Basin at its Oak Point Plant in Belle Chasse, Louisiana. The new pumping station will be a 6,000 gallon per minute (gpm) facility intended to support Chevron's ongoing efforts to increase the capacity of the stormwater treatment system. We anticipate the construction activities will begin by the end of 2004.

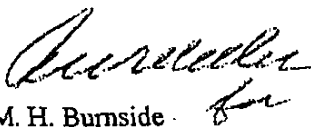
The intake structure for the new pumping station will be founded on a maximum of eight steel pipe piles driven within a steel containment pile (isolation casing) that will prevent contamination of lower water-bearing sands. Material within the containment pile will be removed prior to placement of the structural pile, and managed appropriately. The void area between the two piles will be grout sealed as the containment casing is withdrawn. Based on lithological information obtained during the installation of groundwater monitor wells located to either side of the basin, the base of the containment pile will be driven to Elevation -25msl (see enclosed detail drawing).

Item 7 in Chevron's Solid Waste Permit (P-0112-A-1) requires Chevron to acquire approval from the Louisiana Department of Environmental Quality (LDEQ) should any modifications to the facility, process, disposal or operation of the unit be necessary.

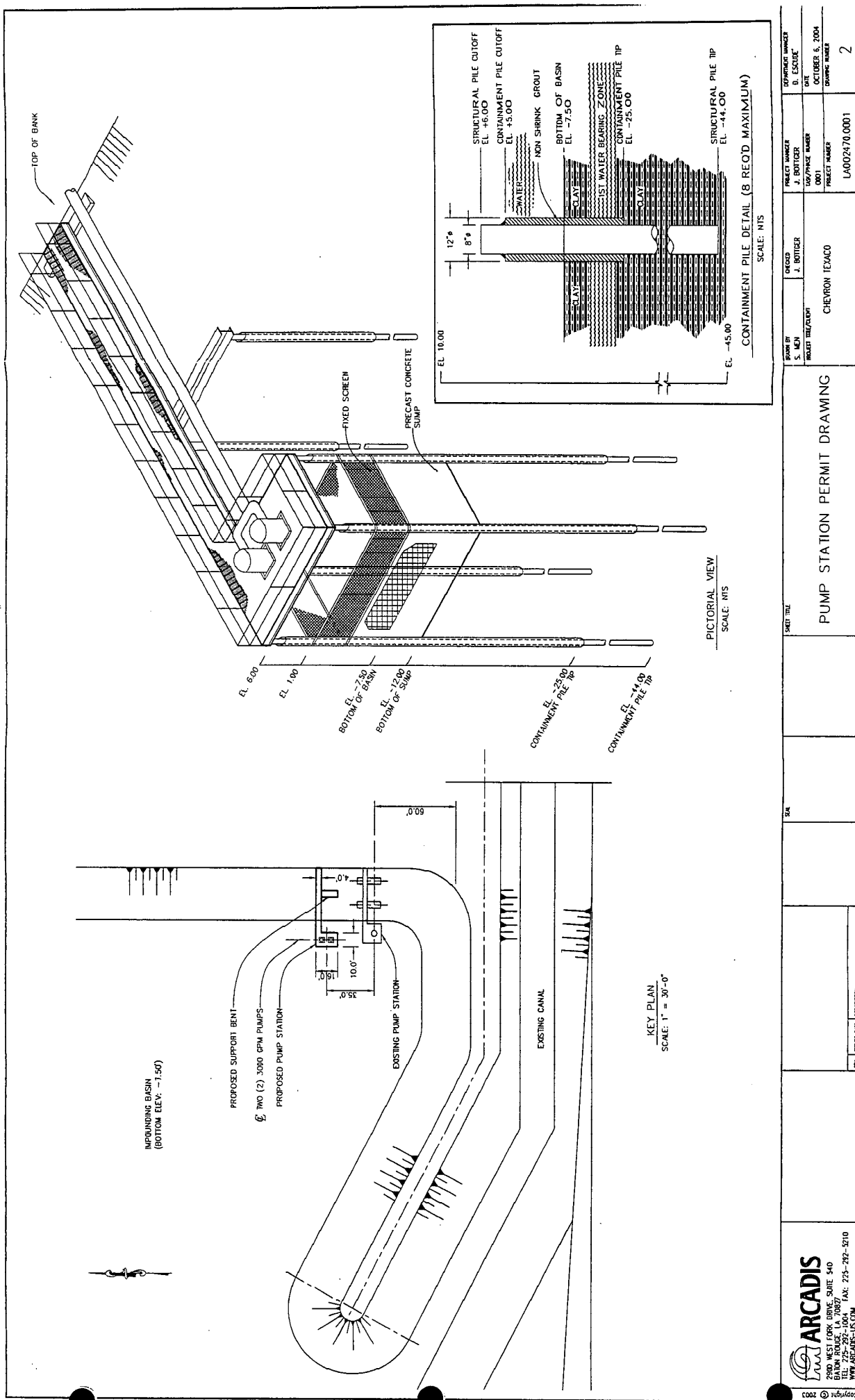
Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

October 21, 2004
Page 2

Chevron respectfully requests LDEQ approval to implement the above-mentioned improvements. Should you have any questions or need further clarification please contact Troy M. Sampey of my staff at (504) 391-6314. Your assistance in this matter is greatly appreciated.


M. H. Burnside

Enclosure



ARCADIS 2500 WEST YORK DRIVE, SUITE 540 WEST YORK, ONTARIO M3J 1B7 TEL: 225-292-1004 FAX: 225-292-5210 WWW.ARCADIS-US.COM		SHEET TITLE PUMP STATION PERMIT DRAWING		PROJECT NUMBER U4002470.0001		SHEET NUMBER 2	
DRAWN BY S. MEN	CHECKED BY J. BOTTOUR	PROJECT TITLE/DATE CHEVRON TEXACO	PROJECT NUMBER U4002470.0001	PROJECT NUMBER U4002470.0001	PROJECT NUMBER U4002470.0001	PROJECT NUMBER U4002470.0001	PROJECT NUMBER U4002470.0001

Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037
Tel 504/391-6314
Fax 504/391-6496

D. L. Bathel
Environmental Supervisor

November 12, 2004



ORONITE

Mr. Robert Niessen
Permits
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Subject:
Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

Dear Mr. Niessen:

Enclosed is Chevron Oronite Company's Checks # 0001283916 and # 0001284008 in the amount of \$1,320.00 as payment for the minor permit modification associated with our correspondence detailing the proposed pump station expansion letter dated October 21, 2004 (copy attached).

If you have any questions, or require additional information, please contact Troy M. Sampey of my staff at (504) 391-6314.

A handwritten signature in cursive script, appearing to read "D. L. Bathel".

D. L. Bathel

Enclosure

Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037
Tel 504/391-6314
~~Fax 504/391-6496~~

D. L. Bathel
Environmental Supervisor

November 12, 2004



Mr. Robert Niessen
Permits
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Subject:
Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

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If you have any questions, or require additional information, please contact Troy M. Sampey of my staff at (504) 391-6314.

A handwritten signature in cursive script that reads "D. L. Bathel".

D. L. Bathel

Enclosure

TMS
11-12-04

Chevron Oronite Company, LLC
Oak Point Plant
P.O. Box 70
Belle Chasse, LA 70037
Tel 504/391-6314
Fax 504/391-6496

M. H. Burnside
Americas Regional Manager

October 21, 2004



Mr. Michael Vince, Administrator
Permits
Office of Environmental Services
Louisiana Department of Environmental Quality
P.O. Box 4313
Baton Rouge, Louisiana 70821-4313

Subject:
Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

Dear Mr. Vince:

Chevron Oronite Company, LLC (Chevron), is proposing the construction of a new pumping station at the Stormwater Impoundment Basin at its Oak Point Plant in Belle Chasse, Louisiana. The new pumping station will be a 6,000 gallon per minute (gpm) facility intended to support Chevron's ongoing efforts to increase the capacity of the stormwater treatment system. We anticipate the construction activities will begin by the end of 2004.

The intake structure for the new pumping station will be founded on a maximum of eight steel pipe piles driven within a steel containment pile (isolation casing) that will prevent contamination of lower water-bearing sands. Material within the containment pile will be removed prior to placement of the structural pile, and managed appropriately. The void area between the two piles will be grout sealed as the containment casing is withdrawn. Based on lithological information obtained during the installation of groundwater monitor wells located to either side of the basin, the base of the containment pile will be driven to Elevation -25msl (see enclosed detail drawing).

Item 7 in Chevron's Solid Waste Permit (P-0112-A-1) requires Chevron to acquire approval from the Louisiana Department of Environmental Quality (LDEQ) should any modifications to the facility, process, disposal or operation of the unit be necessary.

Pump Station Expansion, Impoundment Basin
Solid Waste Permit No. P-0112-A-1
Chevron Oronite Company, LLC
Belle Chasse, Louisiana

October 21, 2004

Page 2

Chevron respectfully requests LDEQ approval to implement the above-mentioned improvements. Should you have any questions or need further clarification please contact Troy M. Sampey of my staff at (504) 391-6314. Your assistance in this matter is greatly appreciated.



M. H. Burnside

Enclosure

CHEVRON ORONITE COMPANY LLC
P.O. BOX 70
BELLE CHASSE, LA 70037-0770

CHECK DATE: 11/04/2004
CHECK NO. 0001283916
ADDRESS BOOK NO.: 71210
COMPANY NO: 310
MAIL STOP: T

ChevronTexaco

2000197 01 SD

6212

T

PG 1 OF 1

State of Louisiana - DEQ
Financial Services Div
PO Box 4311
Baton Rouge LA 70821

DIRECT INQUIRIES TO: P.O. Box 70, Belle Chasse, LA 70037-0770
PHONE CONTACT: 504-391-6253 FAX CONTACT: 504-391-6582

INVOICE DATE	INVOICE #.	DESCRIPTION	GROSS AMT.	DISC. AMT.	NET AMT.
10/31/2004	110104	Solid Waste Minor Permit Mod	\$1,000.00	\$0.00	\$1,000.00
TOTAL			\$1,000.00	\$0.00	\$1,000.00

DETACH AND RETAIN THIS STUB FOR YOUR RECORDS

CHECK # 0001283916 ATTACHED BELOW

ChevronTexaco

CHEVRON ORONITE COMPANY LLC
P.O. BOX 70
BELLE CHASSE, LA 70037-0770

93-516 No. 0001283916
829

71210

11/04/2004

PAY TO
ORDER OF

State of Louisiana - DEQ
Financial Services Div
PO Box 4311
Baton Rouge LA 70821

\$\$\$\$\$\$\$\$\$\$\$1,000.00

NOT VALID AFTER 1 YEAR

1 Thousand and 00/100 Dollars



AUTHORIZED SIGNATURE

CHEVRON ORONITE COMPANY LLC
P.O. BOX 70
BELLE CHASSE, LA 70037-0770

CHECK DATE: 11/06/2004
CHECK NO. 0001284008
ADDRESS BOOK NO.: 71210
COMPANY NO: 310
MAIL STOP: T

ChevronTexaco

2000115 01 SD

6214

T

PG 1 OF 1

State of Louisiana - DEQ
Financial Services Div
PO Box 4311
Baton Rouge LA 70821

DIRECT INQUIRIES TO: P.O. Box 70, Belle Chasse, LA 70037-0770
PHONE CONTACT: 504-391-6253 FAX CONTACT: 504-391-6582

INVOICE DATE	INVOICE #.	DESCRIPTION	GROSS AMT.	DISC. AMT.	NET AMT.
11/03/2004	110304	Solid Waste Minor Permit	\$320.00	\$0.00	\$320.00
TOTAL			\$320.00	\$0.00	\$320.00

DETACH AND RETAIN THIS STUB FOR YOUR RECORDS

CHECK # 0001284008 ATTACHED BELOW

ChevronTexaco

CHEVRON ORONITE COMPANY LLC
P.O. BOX 70
BELLE CHASSE, LA 70037-0770

93-516 No. 0001284008
929

71210

11/06/2004

PAY TO
ORDER OF

State of Louisiana - DEQ
Financial Services Div
PO Box 4311
Baton Rouge LA 70821

\$\$\$\$\$\$\$\$\$\$\$\$\$320.00

NOT VALID AFTER 1 YEAR

Three Hundred Twenty and 00/100 Dollars



AUTHORIZED SIGNATURE



ORONITE

Chevron Chemical Company

Oronite Additives Division

Highway 23 South, Belle Chasse, Louisiana

Mail Address: P.O. Box 70, Belle Chasse, LA 70037-0070

Phone (504) 394-4320

January 31, 1994

MANDATORY PERMIT MODIFICATION

Mr. William J. Mollere, Administrator
Louisiana Department of Environmental Quality
Solid Waste Division
P. O. Box 82178
Baton Rouge, LA 70884-2178

Dear Mr. Mollere:

Chevron Chemical Company is herein submitting four (4) copies of the Mandatory Permit Modification of our Solid Waste Permit, Number P-0112-A1, dated July 28, 1986. The permit applies to our Single NPDES Wastewater Impoundment (Storm Water Impoundment Basin), Storm Water Oil/Water Separator, and Interconnecting Ditches at the Oak Point Plant (Facility Number GD-075-1511) located in Belle Chasse, LA. The application is submitted in accordance with the Louisiana Administrative Code LAC 33:VII, Solid Waste Regulations, February 1993. The document incorporates information from the original application, dated July 7, 1985, as well as new information required by the revised regulations. There are no voluntary modifications proposed at this time and the operation of the unit is essentially the same as described in the original application.

Should you have any questions or require additional information, please feel free to contact Mr. Rick Vincent at (504)391-6331.

Sincerely,

A handwritten signature in dark ink, appearing to read "J. M. MacKenzie". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

J. M. MacKenzie
Plant Manager



MARTHA A. MADDEN
SECRETARY

OFFICE OF SOLID AND HAZARDOUS WASTE

JOHN KOURY
ASSISTANT SECRETARY

March 12, 1987

CERTIFIED MAIL P 302 366 586
RETURN RECEIPT REQUESTED

Mr. J. M. Mackenzie
Plant Manager
Chevron Chemical Company
Post Office Box 70
Belle Chasse, Louisiana 70037-0070

RE: Chevron Chemical Company
Oak Point Plant - Belle Chasse
GD-075-1511
Single NPDES Wastewater Impoundment
Stormwater Oil/Water Separator and
Interconnecting Ditches
Standard Permit No. P-0112-A-1
Log No. S-0-87-0047
Plaquemines Parish

Dear Mr. Mackenzie:

Under the authority of the Louisiana Environmental Quality Act (La. R.S. 30:1051 et seq.), I hereby issue the attached Order authorizing commencement of operation.

Should you have questions or need assistance, please contact the Solid Waste Division at (504) 342-1216.

Sincerely,

JOHN KOURY
Assistant Secretary

JK:BT:dt

Enclosure

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF

CHEVRON CHEMICAL COMPANY

Oak Point Plant - Belle Chasse

GD-075-1511

Single NPDES Wastewater Impoundment

Stormwater Oil/Water Separator

and Interconnecting Ditches

Plaquemines Parish

Mr. J. M. Mackenzie, Plant Manager

Chevron Chemical Company

Post Office Box 70

Belle Chasse, Louisiana 70037-0070

PROCEEDINGS UNDER THE LOUISIANA

ENVIRONMENTAL QUALITY ACT

LA. R.S. 30:1051 ET. SEQ.,

ORDER AUTHORIZING
CONTINUATION OF OPERATION

The following ORDER is issued to Chevron Chemical Company, Oak Point

Plant - Belle Chasse by the Assistant Secretary, Louisiana Department of Environmental Quality, Office of Solid and Hazardous Waste, under the authority granted by the Louisiana Environmental Quality Act (hereinafter referred to as "the Act"), La. R.S. 30:1051 et seq., and particularly by Section 1061 D (6) of the Act and in accordance with Section 6.5.1.C. (1) of the Louisiana Solid Waste Rules and Regulations.

FINDINGS OF FACT

I.

Chevron Chemical Company was issued Standard Permit P-0112-A-1 to operate the Oak Point Plant Single NPDES Wastewater Impoundment (Stormwater Impoundment Basin), Stormwater Oil/Water Separator and Interconnecting Ditches located at Range 24 East, Township 15 South, Section 2 in Plaquemines Parish by the Secretary on July 28, 1986.

II.

On October 9, 1986, Chevron submitted certification that the facility is as described its permit application and confirmed the locations of its groundwater monitoring wells.

III.

On December 29, 1986, an inspection was conducted by employees of the Department of Environmental Quality indicating that the facility was in compliance with the standard permit conditions.

ORDER

Based on the foregoing FINDINGS OF FACT, Chevron Chemical Company is hereby authorized:

I.

To continue the operation of the Oak Point Plant Single NPDES Wastewater Impoundment (Stormwater Impoundment Basin), Stormwater Oil/Water Separator, and Interconnecting Ditches in Plaquemines Parish in accordance with Standard Permit No. P-0112-A-1.

This ORDER is effective on issuance.

Done at Baton Rouge, Louisiana this 12th day of March, 1987.

John Koury
John Koury
Assistant Secretary

Please direct all correspondence related to this matter to:

Mr. Paul D. Miller, Administrator
Solid Waste Division
Post Office Box 44307
Baton Rouge, Louisiana 70804

FACT SHEET

Chevron Chemical Company
GD-075-1511
Plaquemines Parish

- I. This is a set of existing Surface Impoundments and the interconnecting ditches which handles industrial waste and is located on La. Hwy. 23, four miles south of Belle Chasse, Louisiana.
- II. The permit application for this facility was received in August, 1985. Upon review of the application, comments were presented to the applicant and revisions were received.
- III. On March 7, 1986, Chevron was informed that the application was considered to be in conformity with applicable provisions of the Louisiana Solid Waste Rules and Regulations.
- IV. A public notification was issued on April 25, 1986.
- V. Standard Permit No. P-0112 was issued on June 20, 1986.
- VI. Amended Standard Permit No. P-0112-A-1 was issued on July 28, 1986, to correct an error on the original Standard Permit.
- VII. On December 29, 1986, members of the Solid Waste staff conducted an initial compliance inspection and found it to be in accordance with the permit application.
- VIII. On October 9, 1986, Chevron submitted certification that the facility had been constructed in accordance with the permit application.

RECOMMENDATION:

Issue the attached Order Authorizing Continuation of Operation.